Joint Office of Gas Transporters

UNC Modification	At what stage is this document in the process?
# UNC 0664VV: Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4	**01** Modification **02** Workgroup Report **03** Draft Modification Report **04** Final Modification Report

Purpose of Modification:

To create an obligation for Shippers to move Supply Points with low Valid Meter Reading submission performance from Classes 2 and 3 into Class 4, following a consecutive period of poor performance. The CDSP will automatically move any Supply Points not moved by the Shipper in such a scenario (after an allowed period of time).

✓	The Proposer recommends that this modification should be: • subject to self-governance • proceed to Consultation This modification will be presented by the Proposer to the Panel on 20 August 2020. The Panel will consider the Proposer's recommendation and determine the appropriate route.
❗	High Impact: Shippers and Suppliers
❗	Medium Impact: CDSP
❗	Low Impact: Transporters

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Contents

Timetable

Modification timetable:

Initial consideration by Workgroup*	28 August 2018
Workgroup Report presented to Panel*	20 February 2020
Draft Modification Report issued for consultation*	21 February 2020
Consultation Close-out for representations*	19 March 2020
Final Modification Report available for Panel*	24 March 2020
Modification Panel decision*	16 April 2020
Draft Variation Request considered by Workgroup*	11 August 2020
Workgroup Supplemental Report presented to Panel*	20 August 2020
Variation Request considered by Panel	20 August 2020
Draft Modification Report 0664V issued for consultation	20 August 2020
Draft Modification Report 0664V issued for consultation	17 September 2020
Consultation 0664V Close-out for representations	12 October 2020
Final Modification Report 0664V available for Panel	14 October 2020
Modification Panel decision	15 October 2020

* relates to the original 0664 modification

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1 Summary

What

This Modification was initially developed at PAC and is being monitored by PAC.

Post Nexus delivery Unidentified Gas (UIG) is shared out using weighting factors determined by the Allocation of Unidentified Gas Expert (AUGE), and currently less UIG is apportioned to Class 2 and Class 3 Supply Points than to Class 4 Supply Points. However, poor performance in the obtaining of Valid Readings from Supply Meters at Supply Points in these settlement classes does not improve the situation regarding temporary UIG but hinders it further. The PAC has been monitoring the situation over recent months, and it has become clear that poor performance can continue with no incentive (beyond Uniform Network Code (UNC) breach) to rectify the situation in the short term. For this reason, the PAC is seeking to create additional incentives in this area to ensure Shippers reach and maintain a minimum level of Valid Meter Readings that are submitted to the CDSP for both Classes 2 and 3 as established in the UNC.

Why

At present, while Valid Meter Reading submission performance targets are clearly laid out in the UNC TPD Section M, there is no further incentive to ensure Valid Meter Reading performance reaches a suitable level and is maintained. As it stands, without additional incentives, Shippers are able to move large numbers of sites (with potentially high associated energy consumption) into Classes 2 and 3 and, therefore, reduce their UIG exposure. Whilst reading submission in these classes has improved recently, there remain a number of shippers with significant sized portfolios in these classes who are submitting very low numbers of Valid Meter Readings to the CDSP and appear not to be operating effective business processes that meet the requirements of these classes.

How

The solution will create an obligation for Shippers to transfer those Supply Points in Classes 2 and 3 where the percentage of Valid Meter Readings obtained from the Supply Meters is below the minimum required standard into Class 4 for each Shipper and Supplier combination. Valid Reading submission performance will be measured at Supply Point level, with those Supply Points falling below a specified benchmark for a consecutive period being automatically transferred to Class 4. After an allowed period of time, where a Shipper does not move Supply Points that have fallen below the threshold in accordance with the obligation, the CDSP will automatically move those Supply Points into Class 4. There will be no requirement to transfer those Supply Points from Classes 2 and 3 into Class 4 that have had a change of Supplier during the consecutive period where the minimum required Valid Meter Reading standard has not been reached.

2 Governance

Justification for Self Governance

This modification should follow Self Governance Procedures as it only relates to Shippers moving Supply Meter Points to a different product class.

Requested Next Steps

This Modification should:

- be subject to self-governance
- Proceed to Consultation

- Note for Panel: - This Variation Modification 0664VV has been raised as a Variation to Modification 0664V which has already been assessed by the UiG Workgroup, and the recommendations and analysis have been incorporated in the Supplemental Report and Variation Request for 0664V.

3   Why Change?

As it stands currently, performance targets for Valid Meter Reading submissions are clearly laid out in the UNC for all settlement classes. The current Valid Meter Reading submission targets for Class 2 and 3 Supply Points as stated in UNC TPD Section M, stand at 97.5% of a Shipper's portfolio for Class 2, and 90% of a Shipper's portfolio per month for Class 3. However, Shippers can benefit from lower UIG weighting factors by moving sites into Classes 2 and 3, but with no incentive or link to minimum levels of Valid Meter Reading submission performance. Without this link, the additional readings available in these classes will not help the temporary UIG situation, but would further hinder it, potentially creating more unreconciled gas in these categories.

Since November 2017, the PAC has been monitoring levels of Valid Meter Reading submissions for Classes 2 and 3 as the post Nexus settlement classes have been taken up by Shippers and Suppliers, and there are now some 2.1 million Supply Points currently in Class 3. However, the post Nexus regime is now over two years old, and read submission performance remains poor, despite the CDSP offering and giving support to Shippers to improve meter reading submission levels. Given that this educative approach has not been successful to date, the PAC feels that further incentives are needed in this area to improve read submission levels for the new settlement classes.

The most recently reported (anonymous) read submission levels are below (as at October 2019),

Read Performance as of Oct-19

Shipper Name	PC1	PC2	PC3	PC4-Monthly Read	PC4-Annual Read
Ankara	96.77%	-	-	-	-
Apia	-	-	-	40.00%	95.18%
Baghdad	-	-	-	0.00%	74.56%
Banjul	-	-	90.32%	66.67%	84.98%
Berlin	-	-	0.00%	50.00%	95.31%
Bern	-	-	-	0.00%	95.49%
Bishek	-	-	28.83%	0.00%	75.60%
Bissau	-	-	-	50.00%	-
Bratislava	-	-	-	0.46%	5.71%
Brazzaville	100.00%	100.00%	17.90%	25.46%	93.65%
Bucharest	-	-	87.83%	19.07%	75.46%
Castries	-	-	-	-	96.99%
Dili	-	-	80.00%	36.48%	95.76%
Djibouti	-	-	0.00%	62.13%	94.44%
Dublin	-	-	-	100.00%	96.90%
Gaborone	-	-	-	50.00%	81.50%
Gitega	84.51%	95.21%	76.90%	37.07%	83.80%
Hamilton	-	-	-	28.11%	90.65%
Islamabad	-	-	-	23.27%	96.18%
Kampala	-	-	70.00%	50.00%	83.64%
Kinshasa	-	-	-	44.00%	91.85%
Lisbon	-	-	0.07%	18.38%	87.28%
Luanda	-	58.71%	92.89%	80.72%	84.93%
Luxembourg	-	-	-	28.57%	93.34%
Majuro	-	-	-	72.50%	95.17%
Malabo	-	-	64.17%	79.63%	94.73%

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Manama	-	-	9.05%	64.67%	97.05%
Maputo	-	-	-	12.50%	-
Marigot	-	-	-	100.00%	100.00%
Mogadishu	-	-	-	28.57%	84.27%
Monaco	48.39%	-	81.72%	0.00%	-
Monrovia	-	-	-	75.79%	72.75%
Nairobi	-	-	-	50.00%	96.15%
Nassau	100.00%	-	-	-	100.00%
Nuuk	-	-	-	28.95%	97.05%
Oranjestad	-	-	-	27.47%	93.56%
Papeete	88.59%	83.38%	90.44%	75.03%	85.34%
Paramaribo	-	-	-	-	100.00%
Philipsburg	88.99%	70.22%	-	40.58%	92.06%
Prague	-	-	-	26.67%	93.47%
Praia	100.00%	0.00%	78.45%	41.60%	83.80%
Pyongyang	-	-	-	6.67%	16.67%
Quito	-	-	-	53.24%	96.76%
Ramallah	89.00%	0.00%	-	71.21%	95.83%
Reykjavík	80.23%	64.27%	65.32%	93.25%	95.33%
Riyadh	0.00%	-	0.00%	66.67%	93.41%
Rome	93.86%	73.90%	98.47%	88.39%	92.94%
Roseau	-	0.00%	45.24%	62.42%	71.13%
Saipan	92.93%	60.39%	48.39%	74.50%	85.62%
Sarajevo	-	-	-	50.67%	80.02%
Seoul	-	-	80.50%	81.53%	94.28%
Sukhumi	-	-	70.07%	46.94%	88.37%
Suva	-	-	-	-	90.07%
Taipei	-	-	80.35%	39.13%	94.28%
Tallinn	-	-	7.01%	41.39%	92.62%
Tarawa	-	-	-	27.34%	65.66%
Tehran	66.67%	100.00%	-	-	-
Thimphu	100.00%	39.52%	-	88.78%	85.51%
Tiraspol	-	100.00%	-	-	-
Tripoli	-	-	-	0.00%	96.31%
Tunis	-	-	-	83.33%	74.82%
Valletta	66.67%	-	-	66.67%	93.33%
Vilnius	-	-	-	83.28%	92.37%
Warsaw	83.33%	0.00%	-	0.00%	-
Washington	100.00%	53.76%	2.78%	74.60%	88.99%
Industry Total	**82.22%**	**56.21%**	**52.57%**	**47.14%**	**86.95%**

The CDSP will be entitled to charge Shippers on a Supply Point basis for all Supply Points that it reclassifies from Classes 2 and 3 to Class 4 on behalf of Shippers in each calendar month. The CDSP will set out the charging rates and invoicing arrangements within the DSC Contract.

The potential benefits of introducing this modification are below:

SSE Analysis of Costs and Benefits

Table of Unidentified Gas Weighting Factors for Gas Year 2020/21

Supply Meter Point Classification

	Class 1	Class 2	Class 3	Class 4
EUC Band 1	0.22	5.28	45.30	120.98
EUC Band 2	0.22	5.28	13.68	117.79

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EUC Band 3	0.22	4.93	9.17	15.29
EUC Band 4	0.22	3.87	9.17	11.76
EUC Band 5	0.22	2.47	8.56	8.04
EUC Band 6	0.22	1.13	6.30	4.79
EUC Band 7	0.22	0.33	5.14	2.47
EUC Band 8	0.22	0.22	0.42	1.55
EUC Band 9	0.22	0.22	0.22	0.22

Assumptions

UIG of 4% which equates to a 6% allocation on Class 4 in EUCs 1 & 2.

EUC1 usage is 400 therms (approx.12,000 kWh).

EUC2 usage is 3,500 therms (approx.100,000 kWh).

Price of Gas Is 40p / therm.

Potential UIG Avoidance Calculations Based on the above Assumptions

Multiplying the avoided UIG based on the table by the above assumptions gives the below results:

1. Avoidance of UIG from Class 4 to Class 3 in EUC1 is £6.15 per site. 100,000 sites = £615,000

2. Avoidance of UIG from Class 4 to Class 2 in EUC1 is £9.40 per site. 100,000 sites = £940,000

3. Avoidance of UIG from Class 4 to 3 in EUC2 is £72.38 per site. 10,000 sites = £723,800

4. Avoidance of UIG from Class 4 to Class 2 in EUC2 is £78.32 per site. 10,000 sites = £783,200

The CDSP has confirmed that there are 3.9m sites in Class 3 and also confirmed that the AQ at risk there is 170,000 sites in class 3 where no reads have been provided and noted that the analysis provided is modest and that these costs could be greater. Therefore, the benefits when compared to the costs, could be realised in a matter of months.

4 Code Specific Matters

Reference Documents

UNC TPD Section M - https://www.gasgovernance.co.uk/TPD

Supplemental Report for Modification 0664 https://www.gasgovernance.co.uk/0664

Variation Request for Modification 0664V https://www.gasgovernance.co.uk/0664

5 Solution

The solution will deal with the transfer of poor performing Supply Points (from Classes 2 or 3 to class 4),

New Defined Terms:

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The following new defined terms will be required to be added to the UNC

Minimum Percentage Requirement

The minimum percentage of **Valid Readings** required over each Performance Period for each Supply Point in order for the Supply Point to remain in Class 2 or Class 3. For the avoidance of doubt, a Meter Reading will be determined as being a Valid Reading including Meter Readings for Smaller Supply Points that are not specifically subject to Validation, but are determined to be valid (M5.8.3 refers – as introduced by UNC Modification 0700) for determination of meeting performance.

This will be set at 25% initially for both Classes 2 and 3 (i.e. each Supply Meter Point in Class 2 or 3 must obtain Valid Meter Readings for 25% of the days within the Performance Period).   The Minimum Percentage Requirement will be reviewed on an annual basis by the PAC.

Where there is more than one Minimum Percentage Requirement in place across a Performance Period then the lower of the Minimum Percentage Requirements must be met for all of the Performance Period.

Minimum Performance Measure

The percentage of Supply Points that must meet the Minimum Percentage Requirement over each Performance Period in order for all Supply Points to remain in Class 2 or Class 3. This will be set at 90% initially for both Classes 2 and 3. The Minimum Percentage Requirement will be reviewed on an annual basis by the PAC.

Where there is more than one Minimum Performance Measure in place across a Performance Period then the lower of the Minimum Percentage Requirements must be met for all of the Performance Period.

The PAC has confirmed it agreed a 25% target for read performance for 90% of a Shipper's Portfolio was suitable as an initial value, recognising this can be reviewed and amended on an annual basis by the PAC.

Performance Measure

The percentage of daily Valid Meter Readings received, as measured by the CDSP, for each Supply Point in Classes 2 and 3 over each Performance Period.

Performance Period

The time period over which each Performance Measure will be derived. This will initially be set as a consecutive 3 calendar month period, but will be reviewed on an annual basis by the PAC. Where there is a change to the Performance Period then all Performance Measures commencing from that date on will be on the revised Performance Period. Any Performance Periods in place at the date of the Performance Period change will be unaffected by the Performance Period change.

Performance Month

The Supply Meter must be classified as either Class 2 or 3 for the entire calendar month to be considered for a Performance Month within the Performance Period. Where a Supply Meter has been reclassified outside of Class 2 or 3 for any part of the month, or been subject to a Change of Shipper or Supplier after the first calendar day of the month, it will not be considered either to contribute to performance within the month, nor be considered as part of the Portfolio for the Shipper and Supplier combination for determining the 'Performance Contributing Portfolio'.

Performance Contributing Portfolio

This is total Class 2 and Class 3 Supply Meter Point portfolio for each Shipper and Supplier combination, less any Supply Meters that are not included within the Performance Month – e.g. as a result of reclassification or Shipper transfer on any day other than the first of the month.

Lock-out Period

The time period over which Shippers will not be able to re-register Supply Points into Classes 2 or Class 3 that have been removed from either of these Classes due to them failing the Minimum Percentage Requirement. The Lock-out Period will begin on the day of re-registration into Class 4. The lock-out period will cease to apply if there is a change of Shipper or Supplier at the Supply Point or if the Supply Point qualifies to be registered as a Class 1 Supply Point. The lock-out period will be initially set at 3 months and will be reviewed on an annual basis by the PAC. Where there is a change to a Lock-Out Period all Supply Points that are in a Lock-Out period will be subject to the shorter of the Lock-Out periods.

Notification of revised Minimum Percentage Requirement, Minimum Performance Measure, Performance Period and Lock-Out Period

For each Gas Year, the Performance Assurance Committee will maintain or revise the Minimum Percentage Requirement, the Minimum Performance Measure, the Performance Period and Lock-Out Period.

The Performance Assurance Committee will consult with the Uniform Network Code Committee on any revisions and provide the reasons for the revisions.

Not later than 31st August in the Preceding Year (and in sufficient time to meet CDSP system time constraints), the PAC will confirm to the CDSP any revisions, who will apply them from 1st October for the upcoming Gas Year. The PAC will also confirm any revisions to Users.

Where the Performance Assurance Committee is unable to or does not determine any revisions for the upcoming Gas Year, the CDSP shall rollover all values applying in the preceding Gas Year

The business rules are below.

Business Rules

1. It is proposed that the current read provision obligations in section M, 5.7 and 5.8 are extended to add minimum individual Supply Meter Reading performance targets (Minimum Percentage Requirement). In addition to the existing portfolio level, Valid Read submission targets, each Supply Point registered in settlement Classes 2 and 3 will have Valid Supply Meter Readings measured daily where they meet the criteria to be considered for the Performance Month.

2. While the existing portfolio level Valid Reading submission targets will remain (97.5% per day for Class 2, 90% per day for Class 3), in addition, each Supply Point will need to meet a minimum level of performance over the Performance Period. If any Supply Meter in either Class 2 or 3 provides less than [25%] of daily reads (the 'Minimum Percentage Requirement') across the consecutive period, the Supply Point will be required to be reclassified to Class 4 following that period provided that the Shipper and Supplier combination has not met a satisfactory performance across its Class 2 and 3 Performance Contributing Portfolio (as described in Business Rule 10.

3. The table below demonstrates the mechanism for measuring Supply Point level read performance, where the number of accepted Valid Meter Readings provided for a Supply Point in any given Performance Month is recorded and measured to generate an individual monthly read submission performance. The Performance Measure calculated for each Supply Point will be average of the Performance Months contained within each Performance Period.

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	MPRN 1	MPRN 2	MPRN 3	MPRN 4	MPRN 5	MPRN 6	MPRN 7	MPRN 8	MPRN 9	MPRN 10
Day 1	1							1		
Day 2	1	1						1		
Day 3	1	1			1			1		
Day 4	1	1						1		
Day 5	1	1			1	1		1		
Day 6	1	1				1				
Day 7	1	1		1	1	1				
Day 8	1	1				1				
Day 9	1	1			1	1				
Day 10	1	1				1				
Day 11	1	1			1	1				
Day 12	1	1				1				
Day 13	1	1			1	1				
Day 14	1					1				
Day 15	1				1	1				
Day 16	1					1			1	
Day 17	1				1	1			1	
Day 18	1					1			1	
Day 19	1				1	1			1	
Day 20	1					1				
Day 21	1					1				
Day 22	1					1				
Day 23						1				
Day 24	1				1	1				
Day 25	1				1	1				
Day 26	1				1					
Day 27	1				1					
Day 28	1				1					
Day 29	1									
Day 30	1									
Day 31										
Total	29	12	0	1	14	21	0	5	4	0
Percentage	93.55%	38.71%	0.00%	3.23%	45.16%	67.74%	0.00%	16.13%	12.90%	0.00%

4. Read submission would be measured by the receipt of a Valid Reading, accepted into CDSP systems, including those not explicitly subject to Validation (re: M5.8.3) but deemed valid for performance purposes. The relevant percentage would be calculated for each Performance Period, calculated as the straight average of each Performance Month without any weighting for the number of days in each month and so, for example, where a Performance Period included the months of January, February and March, February's performance would have equal weighting as those of January and March in determining the performance over the Performance Period, which will be set initially as a 3 month period, and set on an annual basis by the PAC.

5. Following a change of Shipper or Supplier, Supply Point Valid Reading performance will be reset for the new Shipper and Supplier combination. Performance measurement will begin from the 1st day of the next Performance Period after the change of Shipper or Supplier for the Supply Point and so allowing complete months to be measured.

6. Any Supply Meters that move into Class 2 or 3 from Class 1 or 4 after the first day of the month will be considered against the Performance Period from the start of the subsequent month – i.e. the start of the next Performance Month.

7. Any Supply Meters that move from Class 3 to Class 2 or vice-versa during the Performance Period will have to meet the Valid Meter Reading submission level of the lower target for the whole of the Performance Period.

8. Reporting will be produced and sent to Shippers by the 20th day of each month and will highlight to Shippers all Supply Points where the individual Performance Measure has fallen below the Minimum Performance Standard for each of their Shipper and Supplier combinations. Notification and backing data containing the individual Supply Points will be sent to the relevant Shipper(s). Summary reporting will also be delivered to the PAC in a timely manner.

9. Affected Shippers will be obliged to change the class of the relevant Supply Points to Class 4 at the earliest opportunity, but in any event the transfers must be completed within 20 calendar days from receipt of the report. The only exceptions to this are:

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i. any Supply Points where the Class 1 Requirement applies during the Performance Period – including, for the avoidance of doubt, those where the Supply Meter Point is comprised in a Supply Point in respect of which the circumstances set out in the Class 1 Ratchet Charge Guidance Document apply.

ii. any Supply Points where the supplier has changed during the Performance Period or prior to the reclassification of the Supply Point. Where a change of supplier occurs during the Lock-Out Period then the Lock-Out period will immediately end.

10. To allow for faulty meters and problematic sites any Shipper and Supplier combination that achieves the Minimum Performance Measure for:

    a)   at least [90%] of their Class 2 Supply Meter portfolio the Shipper shall not be required to reclassify any existing Class 2 Supply Meters to Class 4

    b)   at least [90%] of their Class 3 Supply Meter portfolio the Shipper shall not be required to reclassify any existing Class 3 Supply Meters to Class 4.

11. Where an overall Shipper portfolio meets the Minimum Performance Measure then no Supply Meters will need to be reclassified irrespective of the performance of any Shipper and Supplier combinations under that Shipper. The performance of each Shipper and Supplier combination are only considered when the overall Shipper portfolio does not meet the Minimum Performance Measure.

12. The Performance Measure will be solely based on the Performance Period. Any improvement in performance after a Performance Period, but prior to the registration into Class 4, will not be considered and cannot be used as a reason for non-registration into Class 4. Once a Supply Point is determined to have failed the Performance Target for a Performance Period the Supply Point will be required to be reclassified – regardless whether performance subsequent to the Performance Period, but prior to reclassification, improves such that the Supply Point would not have failed the Performance Target in the subsequent Performance Period.

13. If the identified poor performing Supply Points have not been registered and become effective into Class 4 within 20 days of receipt of the reports by Shippers, the CDSP will reclassify these Supply Points to class 4 as soon as is practical. For the avoidance of doubt, any poor performing sites that fail the target will remain in the Performance Contributing Portfolio and will continue to contribute to any subsequent Performance Period measures until they are registered into Class 4

14. Any Supply Points in Classes 2 and 3 transferred to Class 4 due to the failure to meet the minimum Performance Measure at the Supply Meter may not be transferred to Classes 2 and 3 for a minimum Lock-out period, which will initially be set at (3) months, from their transfer into Class 4. This Lock-Out Period will be determined on an annual basis by the PAC. This condition will not apply after a change of Shipper or Supplier where the new or existing Shipper will be able to change any Class 4 Supply Point into Class 2 or Class 3 in line with normal UNC timescales. This Lock-Out period will not apply to a Supply Point that requires to be re-registered from Class 4 to Class 1.

15. New reports will need to be added to the Performance Assurance Register in order to provide Shipper and Supplier performance in adhering to the criteria specified in this Modification. These are included below.

Schedule 2A.x – Industry Peer Comparison View

Report Title	**Sites converted from PC 2/3 to PC4 by the CDSP due to low read submission levels at individual supply points**

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Report Reference	2A.x (reference to be determined following implementation of UNC Modification 0664)
Report Purpose	To compare performance for each Shipper in managing their valid meter reading submission for Class 2 and 3 supply points against the minimum submission at supply point level (not against the UNC portfolio level targets), by reporting on the number of sites which the CDSP has converted to Class 4, following failure to meet the minimum requirements at levels over the Performance Period.
Expected Interpretation of the report results	The aim is to understand whether required UNC minimum standards are being met. The report should identify performance across all market participants
Report Structure (actual report headings & description of each heading)	Monthly non-cumulative report Peer Comparison Identifier Product Class Count of supply points for which the CDSP has moved to Class 4 during the month Industry Total
Data inputs to the report	SSC Peer Comparison Identifier Product Class Count of sites converted by the CDSP Excludes Class changes initiated by the Shipper
Number rounding convention	Whole numbers
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)	Sites are counted if they became live as Class 4 on any date in the calendar month. Sites are excluded if the Shipper initiated the Class change, or if the Class change was due to a change of Shipper The report is prepared as soon as possible after the end of the calendar month
Frequency of the report	Monthly

Sort criteria (alphabetical ascending etc.)	Peer Comparison Identifier alphabetically
History/background	Requirement introduced to support UNC Modification 0664 obligations
Additional comments	
Estimated development costs	
Estimated ongoing costs	

Supply Points converted from PC2 or PC3 to PC4 by the CDSP due to low read submission (in accordance with UNC obligations x.x.x)							
	Month x		Month x + 1		Month x + 2		Etc for 12 months
Sub-category	PC2	PC3	PC2	PC3	PC2	PC3	
Identifier A	0	0	0	0	0	0	
Identifier B	0	0	0	0	00	0	
Etc							
Total	0	0	0	0	00	0	

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Schedule 2B.x – Performance Assurance Committee View

Report Title	**Sites converted from PC 2/3 to PC4 by the CDSP due to low read submission levels at individual supply points**
Report Reference	2B.x (reference to be determined following implementation of UNC Modification 0664)
Report Purpose	To compare the performance for each Supplier in managing their valid meter reading submission for Class 2 and 3 supply points against the minimum submission at supply point level (not against the UNC portfolio level targets), by reporting on the number of sites which the CDSP has converted to Class 4, following failure to meet the minimum requirement levels over the Performance Period, as a count of Supply Points, as a percentage of the portfolio for that Shipper and Supplier combination's Supply Points in that Class and as an aggregate Rolling AQ.
Expected Interpretation of the report results	The aim is to understand whether required UNC minimum standards are being met. The report should identify performance across all market participants
Report Structure (actual report headings & description of each heading)	Monthly non-cumulative report

Shipper Short Code

Product Class

Count of supply points for which the CDSP has moved to Class 4 during the month

Percentage of the Shipper's Supply Points in that Class that have been moved each month (as a percentage of their position at the start of the performance month)

Aggregate Rolling AQ of the Shipper's Supply Points in that Class that have been moved each month

Industry Totals |
| Data inputs to the report | SSC

Product Class

Count of sites converted by the CDSP

Rolling AQ of the Shipper and Supplier combination's Supply Points in that Class that have been moved

Total count of the Shipper's Supply Points in that Class at the start of the month

Excludes Class changes initiated by the Shipper |
| Number rounding convention | Whole numbers

Percentage figures to 1 decimal place |
| History (e.g. report builds month on month) | A Rolling 12-month view provided monthly |

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Rules governing treatment of data inputs (actual formula/specification to prepare the report)	Sites are counted if they became live as Class 4 on any data in the calendar month. Sites are excluded if the Shipper initiated the Class change, or if the Class change was due to a change of Shipper The report is prepared as soon as possible after the end of the calendar month
Frequency of the report	Monthly
Sort criteria (alphabetical ascending etc.)	Shipper shortcode alphabetically
History/background	Requirement introduced to support UNC Modification 0664 obligations
Additional comments	
Estimated development costs	
Estimated ongoing costs	

Count of Supply Points converted from **Class 2** to Class 4 by the CDSP due to low read submission (in accordance with UNC obligations x.x.x)

Sub-category	Month x		Month x + 1		Month x + 2		Etc for 12 months	
	Count	AQ	Count	AQ	Count	AQ	Count	AQ
Shipper A	0	0	0	0	0	0		0
Shipper B	0	0	0	0	00	0		0
Total	0	0	0	0	00	0		0

Percentage of Shipper and Supplier combination's Supply Points in **Class 2** converted to Class 4 by the CDSP due to low read submission (in accordance with UNC obligations x.x.x)

Class 2	Month x	Month x + 1	Month x + 2	Month x + 3	Month x + 4	Month x + 5	Etc for 12 months
Identifier A	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Identifier B	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Etc	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Industry Performance	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Count of Supply Points converted from **Class 3** to Class 4 by the CDSP due to low read submission (in accordance with UNC obligations x.x.x)

	Month x		Month x + 1		Month x + 2		Etc for 12 months	
Sub-category	Count	AQ	Count	AQ	Count	AQ	Count	AQ
Shipper A	0	0	0	0	0	0		0
Shipper B	0	0	0	0	00	0		0
Total	0	0	0	0	00	0		0

Percentage of Shipper's Supply Points in Class 3 converted to Class 4 by the CDSP due to low read submission (in accordance with UNC obligations x.x.x)

Class 3	Month x	Month x + 1	Month x + 2	Month x + 3	Month x + 4	Month x + 5	Etc for 12 months
Identifier A	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Identifier B	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Etc	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Industry Performance	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Schedule 2A.y – Industry Peer Comparison View

Report Title	**Class 2 and 3 Individual Read Performance against the Minimum Percentage Requirement**
Report Reference	2A.y (reference to be determined following implementation of UNC Modification 0664)
Report Purpose	To compare the performance for each Shipper in managing their valid meter reading submission for Class 2 and 3 supply points against the Minimum Percentage Requirement at supply point level (not against the UNC portfolio level targets), by reporting on the proportion of the portfolio achieving the applicable Minimum Percentage Requirement, plus the count. (Note that the Minimum Percentage Requirement will be reviewed by PAC each year and therefore may change from time to time).
Expected Interpretation of the report results	The aim is to understand whether required UNC minimum standards are being met. The report should identify performance across all market participants.
Report Structure (actual report headings & description of each heading)	Monthly non-cumulative report Peer Comparison Identifier Product Class Percentage of the Shipper's portfolio (by count) which met the Minimum Percentage Requirement each month of the report period Industry Performance Percentage
Data inputs to the report	SSC Peer Comparison Identifier Product Class Individual meter point read performance (percentage of days for which reads were accepted for the month) Minimum Percentage Requirement
Number rounding convention	To one decimal place
History (e.g. report builds month on month)	A Rolling 12-month view provided monthly
Rules governing treatment of data inputs (actual	Sites are excluded if there was a Shipper transfer or Class change (whether initiated by the Shipper or the CDSP) in the month.

formula/specification to prepare the report)	The report is prepared at least 10 days after the end of the calendar month, and is therefore reported 2 months in arrears.
Frequency of the report	Monthly
Sort criteria (alphabetical ascending etc.)	Peer Comparison Identifier alphabetically
History/background	Requirement introduced to support UNC Modification 0664 obligations
Additional comments	
Estimated development costs	
Estimated ongoing costs	

Percentage of individual Supply Points where the Minimum Percentage Requirement of **[x%]** has been achieved by month (by count)

Class 2	Month x	Month x + 1	Month x + 2	Month x + 3	Month x + 4	Month x + 5	Etc for 12 months
Identifier A	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Identifier B	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Etc	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Industry Performance	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Percentage of individual Supply Points where the Minimum Percentage Requirement of **[x%]** has been achieved by month (by count)

Class 3	Month x	Month x + 1	Month x + 2	Month x + 3	Month x + 4	Month x + 5	Etc for 12 months
Identifier A	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Identifier B	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Etc	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Industry Performance	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

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Schedule 2B.y – Performance Assurance Committee View

Report Title	**Class 2 and 3 Individual Read Performance against the Minimum Percentage Requirement**
Report Reference	2B.y (reference to be determined following implementation of UNC Modification 0664)
Report Purpose	To compare the performance for each Shipper in managing their valid meter reading submission for Class 2 and 3 supply points against the Minimum Percentage Requirement at supply point level (not against the UNC portfolio level targets), by reporting on the proportion of the portfolio achieving the applicable Minimum Percentage Requirement, plus the count and aggregate Rolling AQ of the Supply Points that have not achieved the Minimum Percentage Requirement. (Note that the Minimum Percentage Requirement will be reviewed by PAC each year and therefore may change from time to time).
Expected Interpretation of the report results	The aim is to understand whether required UNC minimum standards are being met, and quantify the likely risk to Settlement of Supply Points which are falling below the standard. The report should identify performance across all market participants.
Report Structure (actual report headings & description of each heading)	Monthly non-cumulative report Shipper Shortcode Product Class Percentage of the Shipper's portfolio which met the Minimum Percentage Requirement each month of the report period Industry Performance Percentage Count and aggregate Rolling AQ of Supply Points which did not meet the Minimum Percentage Requirement each month of the report period
Data inputs to the report	SSC Product Class Individual meter point read performance (percentage of days for which reads were accepted for the month) Rolling AQ
Number rounding convention	Percentages to one decimal place Whole numbers of Supply Points Aggregate Rolling AQ (kWh)

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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)	Sites are excluded if there was a Shipper transfer or Class change (whether initiated by the Shipper or the CDSP) in the month.

The report is prepared at least 10 days after the end of the calendar month, and is therefore reported 2 months in arrears. |
Frequency of the report	Monthly
Sort criteria (alphabetical ascending etc.)	Shipper Shortcode alphabetically
History/background	Requirement introduced to support UNC Modification 0664 obligations
Additional comments	
Estimated development costs	
Estimated ongoing costs	

Percentage of individual Supply Points where the Minimum Percentage Requirement of **[x%]** has been achieved by month

Class 2	Month x	Month x + 1	Month x + 2	Month x + 3	Month x + 4	Month x + 5	Etc for 12 months
Shipper A	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Shipper B	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Etc	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Industry Performance	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Percentage of individual Supply Points where the Minimum Percentage Requirement has been achieved by month

Class 3	Month x	Month x + 1	Month x + 2	Month x + 3	Month x + 4	Month x + 5	Etc for 12 months
Shipper A	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

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Shipper B	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Etc	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Industry Performance	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Count and aggregate Rolling AQ of Supply Points where the Minimum Percentage Requirement of **[x%]** has **not** been achieved by month								
Class 2	Month x		Month x + 1		Month x + 2		Etc for 12 months	
	Count	AQ	Count	AQ	Count	AQ	Count	AQ
Shipper A	0	00,000	0	00,000	0	00,000	0	00,000
Shipper B	0	00,000	0	00,000	0	00,000	0	00,000
Etc	0	00,000	0	00,000	0	00,000	0	00,000
Industry Totals	0	00,000	0	00,000	0	00,000	0	00,000

Count and aggregate Rolling AQ of Supply Points where the Minimum Percentage Requirement of **[x%]** has **not** been achieved by month								
Class 3	Month x		Month x + 1		Month x + 2		Etc for 12 months	
	Count	AQ	Count	AQ	Count	AQ	Count	AQ
Shipper A	0	00,000	0	00,000	0	00,000	0	00,000
Shipper B	0	00,000	0	00,000	0	00,000	0	00,000
Etc	0	00,000	0	00,000	0	00,000	0	00,000
Industry Totals	0	00,000	0	00,000	0	00,000	0	00,000

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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

It should be noted that settlement classes do not necessarily correlate to customer products (in that settlement read submission does not necessarily impact the type of product offered to the customer by a supplier). If this were to be the case, non-submission of meter reads could potentially be detrimental to the customer – this Modification seeks to ensure that Shippers are able to appropriately manage the expected performance levels before moving Supply Points into these settlement classes. This modification ensures that poorly performing suppliers do not impact better performing suppliers under the same shipper.

However, this will need further consideration by the workgroup as there may be links to customer contracts that the Modification may need to consider.

Cross Code Impacts

It has been identified that there is an impact on IGT UNC and a housekeeping Modification will be raised by the proposer to address the inclusion of UNC section M 5.17.

EU Code Impacts

None identified.

Central Systems Impacts

There have been central systems impacts identified and discussed with CDSP in relation to this change which have been captured in XRN 4990.

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7   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	Positive

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(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	
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

This Modification proposes additional incentives to ensure timely submission of Valid Meter Readings for the relevant classes to be used for settlement purposes and to increase the accuracy of UIG. As such, more accurate and frequent read submission data in central systems should lead to more accurate cost allocation and so, therefore, furthering competition and relevant objective d.

The introduction of the Lock-out period excludes shipper lock-out where a change of supplier has occurred, in order to avoid suppliers being potentially penalised due to the performance of previous suppliers. The proposer believes that this will prevent the modification potentially being at odds with the Ofgem Switching Programme which puts the supplier rather than the shipper at the heart of the switching process. The targets are at a Shipper and Supplier Combination level which prevents a poorly performing Supplier from impacting other Suppliers under the same Shipper. Where an overall Shipper portfolio meets the necessary performance target then no Supply Points will be locked out, irrespective of the Shipper and Supplier combination performance under that Shipper.

8   Implementation

Will be aligned with the XRN 4990

9   Legal Text

EXPLANATORY TABLE

MODIFICATION 0664V

TRANSFER OF SITES WITH LOW VALID METER READING SUBMISSION PERFORMANCE FROM CLASSES 2 AND 3 INTO CLASS 4

Reference	Explanation
Transportation Principal Document	
Section M – Supply Point Metering	
5.17	New paragraph headed 'Performance Assurance: Class 2 and 3 Supply Meter Points'.

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5.17.1	New definitions:
	- Aggregate Valid Meter Reading Requirement; the requirement a User secure the Minimum VMR Requirement for not less than 90% of Class 2 and 3 Supply Meter Points in a Performance Period;
	- Individual Valid Meter Reading Requirement; requirement a User secure a Valid Meter Reading is obtained for Class 2 and 3 Supply Meter Points for 25% of days in a Performance Period;
	- Performance Period: a period of one or more calendar months as determined by the PAC;
	- Lock-out Period; a period as determined by the PAC during which the Registered User may not re-classify a Supply Meter Point which has been reclassified as Class 4 following the Registered User's failure to achieve the Aggregate Valid Meter Reading Requirement for a Performance Period
	- Relevant Class 2 and Class 3 Meter Points; in relation to a User and a calendar month, are relevant Supply Meter Points with the appropriate class where the User was the Registered User for all days in the calendar month.
5.17.2	PAC to notify Users and the CDSP annually of the Applicable Percentage for Class 2 and 3 Supply Meters for the following Gas Year for the purposes of both the Aggregate Valid Meter Reading Requirement and the Individual Valid Meter Reading Requirement definitions, i.e. what will initially be 90% and 25% respectively for both Class 2 and 3 (though they may diverge if the PAC so determine). PAFA also to notify Users annually of the duration (in calendar months) of each Performance Period and the Lock-out Period in the following Gas Year.
5.17.3	The requirement that a User secure that for each of Class 2 and 3 the User secure satisfaction of the Aggregate Valid Meter Reading Requirement and the Individual Meter Reading Requirement.
5.17.4	CDSP to notify User of their performance, and where the Aggregate Valid Meter Reading Requirement is failed the CDSP will identify those sites at which the Individual meter Reading Requirement was not satisfied, i.e. a Failed Supply Meter Point.

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5.17.5	Following notification by the CDSP that a site is a Failed Supply Meter Point the Registered User will take steps by way of a Supply Point Amendment to have the Failed Supply Meter Point reclassified as a Class 4 Supply Meter Point. The re-classification should be effective within 20 days of the CDSP's notification the site is a Failed Supply meter Point, failing which the CDSP will effect the re-classification to Class 4.
5.17.6	The re-classification rule will however not apply if in relation to the Failed Supply Meter Point the Class 1 Read Requirement applies or a change of supplier occurs at any time during the Performance Period.
5.17.7	This prohibits a User re-classifying a site as Class 2 or 3 following its re-classification as Class 4 under paragraph 5.17.5 prior to the end of the Lock-out Period or if earlier the date following any change in supplier at the Failed Supply Meter Point,.
5.17.8	In relation to a Performance Period which straddles different Gas Years, where different Applicable Percentages apply to calendar months in each year the Aggregate VMR Requirement and the Minimum VMR Requirement calculation for the Performance Period will use the lower Applicable Percentage for all calendar months in the Performance Period regardless of which year in which the month falls.
5.17.9	To address sites which move between Class 2 and 3 in a Performance Period but which remain registered with the same User; the site will be deemed to be in the Class with the lower Applicable Percentage, or where the same, the Class applying following the change in Class.
Transition Document	
Part IIC	
1.3.7	Opening values for each Applicable Percentage, and for the duration of the Performance Period and Lock-out Period.

MODIFICATION 0664V

TRANSFER OF SITES WITH LOW VALID METER READING SUBMISSION PERFORMANCE FROM CLASSES 2 AND 3 INTO CLASS 4

Proposed legal text

TRANSPORTATION PRINCIPAL DOCUMENT

SECTION M – SUPPLY POINT METERING

Add new paragraph 5.17 to read as follows:

5.17   **Performance Assurance: Class 2 and 3 Supply Meter Points**

5.17.1   For the purposes of this paragraph 5.17:

(a)   "**Aggregate Valid Meter Reading Requirement**" is the requirement, in respect of each Class of Relevant Supply Meter Point, that a User secure the Individual Valid Meter Reading Requirement is satisfied for not less than the Applicable Percentage of the User's Relevant Supply Meter Points in a Performance Period;

(b)   "**Individual Valid Meter Reading Requirement**" is the requirement, in respect of a Relevant Supply Meter Point, that a User secure a Valid Meter Reading is obtained for the Relevant Supply Meter Point for not less than the Applicable Percentage of Days in a Performance Period;

(c)   "**Lock-out Period**" means in relation to a Failed Supply Meter Point the period determined as such by the PAC (commencing on the date the Failed Supply Meter Point is re-classified in accordance with paragraph 5.17.5) and notified to Users in accordance with paragraph 5.17.2;

(d)   "**Performance Period**" means the period determined as such by the PAC (commencing on the first day of a calendar month and comprising one or more consecutive calendar months) and notified to Users in accordance with paragraph 5.17.2;

(e)   in relation to a User and a calendar month:

(i)   a "**Relevant Class 2 Supply Meter Point**" is a Supply Meter Point comprised in a Class 2 Supply Point in respect of which the User was the Registered User of the Supply Point for all days in the calendar month;

(ii)   a "**Relevant Class 3 Supply Meter Point** " is a Supply Meter Point comprised in a Class 3 Supply Point in respect of which the User was the Registered User of the Supply Point for all days in the calendar month;

(iii)   a "**Relevant Supply Meter Point**" is a Relevant Class 2 Supply Meter Point or (as the case may be) a Relevant Class 3 Supply Meter Point.

5.17.2   The Performance Assurance Committee will in respect of a Gas Year notify Users and the CDSP by no later than 31 August in the Preceding Year of:

(a)   the applicable percentage (an "**Applicable Percentage**") which shall apply in relation to each Class of Relevant Supply Meter Point for the purposes of determining if a User has satisfied the Aggregate Valid Meter Reading Requirement and the Individual Valid Meter Reading Requirement in a Performance Period in respect of each Class of Relevant Supply Meter Point;

(b)   the number of calendar months in each Performance Period commencing from the first calendar month of the Gas Year; and

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(c)   the duration of the Lock-out Period in relation to a Supply Meter Point which is identified as a Failed Supply Meter Point during the Gas Year.

5.17.3 Each User shall secure that in respect of each Class of Relevant Supply Meter Point and a Performance Period:

(d)   the Aggregate Valid Meter Reading Requirement is satisfied in relation to the User's Relevant Supply Meter Points; and

(e)   the Individual Valid Meter Reading Requirement is satisfied in relation to each of the User's Relevant Supply Meter Points.

5.17.4 The CDSP will notify each User by no later than twentieth (20th) day of the calendar month following the end of a Performance Period, and in respect of each Class of Relevant Supply Meter Point:

(f)   if the User has failed to satisfy the Aggregate Valid Meter Reading Requirement; and

(g)   if so, the identity of those Relevant Supply Meter Points in respect of which the User has failed to satisfy the Individual Valid Meter Reading Requirement (each a "**Failed Supply Meter Point**").

and paragraph 5.17.5 shall apply in respect of each Failed Supply Meter Point.

5.17.5 Where this paragraph applies, and subject to paragraph 5.17.6, the User shall submit, as soon as reasonably practicable, a Supply Point Amendment to change the Class of the Failed Supply Meter Point to a Class 4 Supply Meter Point with an effective date no later than twenty (20) days following the CDSP's notification under paragraph 5.17.4 (failing which the CDSP shall as soon as reasonably practicable thereafter revise the Supply Point Register such that the Failed Supply Meter Point is re-classified as a Class 4 Supply Meter Point).

5.17.6 Paragraph 5.17.5 shall not apply in relation to a Failed Supply Meter Point if on any Day during the relevant Performance Period:

(a)   the Class 1 Requirement applies in relation to the Failed Supply Meter Point; or

(b)   a change of supplier occurs in respect of the Failed Supply Meter Point.

5.17.7 Following the change of Class of a Failed Supply Meter Point in accordance with paragraph 5.17.5 the User who is the Registered User of the Failed Supply Meter Point during the relevant Performance Period shall not be permitted to change the Class of the Failed Supply Meter Point to Class 2 or Class 3 until the earlier of:

(a)   the expiry of the Lock-out Period; or

(b)   if a change of supplier occurs in respect of the Failed Supply Meter Point during the Lock-out Period, the date following the date on which such change was effective.

5.17.8 Where an Applicable Percentage for a Gas Year is different from the equivalent Applicable Percentage for the Preceding Year the lower Applicable Percentage shall be treated as applying in respect of each Performance Period which includes a calendar month falling in both the Gas Year and the Preceding Year.

5.17.9 Where a User changes the Class of a Relevant Supply Meter Point from Class 2 to Class 3, or vice versa, and the User continues as the Registered User of the Supply Point in which the Supply Meter Point is comprised for all days in a Performance Period, the Supply Meter Point shall be deemed for the purposes of this paragraph 5.17 to be a Relevant Supply Meter Point falling in:

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    (c)   the Class with the lowest Applicable Percentage applying in respect of the Individual Valid Meter Reading Requirement in relation to the calendar month in which the change of classification was effective;

    (d)   where the Applicable Percentages referred to paragraph (a) are the same, the Class of the Supply Meter Point following the change in classification.

TRANSITION DOCUMENT

PART IIC

Add new paragraph 1.3.7 to read as follows:

1.3.7   **TPD Section M5.17**

For the purposes of TPD Section M5.17 and for the Gas Year in which the Code Modification referred to as Modification 0664 is implemented and effective from:

    (e)   in relation to the both Relevant Class 2 Supply Meter Points and Relevant Class 3 Supply Meter Points:

          (i)   the Applicable Percentage in relation to the Aggregate Valid Meter Requirement is ninety per cent (90%);

          (ii)   the Applicable Percentage in relation to the Minimum Valid Meter Reading Requirement is twenty-five per cent (25%);

    (f)   the Performance Period is a period of three (3) calendar months, and the first Performance Period shall commence on the first day of the calendar month following implementation of and the effective date of the Code Modification referred to as Modification 0664; and

    (g)   the Lock-out Period is a period of three (3) months.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to on the basis that Workgroup have already reviewed the impacts of this modification following analysis of Modification 0664V, the Supplemental Report and the Variation Request, that the change to BR10 has been captured in the revised Legal Text and reviewed and therefore request Panel to:

- Proceed to Consultation
- Agree that Self-governance should apply

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