Joint Office of Gas Transporters

UNC Workgroup Report	At what stage is this document in the process?

UNC 0784S:

Transition to the Central Switching Service and the Retail Energy Code v3.0

01	Modification
02	Workgroup Report
03	Draft Modification Report
04	Final Modification Report

Purpose of Modification:

This Modification details the transitional arrangements that will be required to the Uniform Network Code (UNC) in order to implement the Central Switching Service (CSS) and transition to the Retail Energy Code version 3.0 (REC v3). This Modification will assist the technical transition of mastering data items (including the Registration) from UNC to REC. For the avoidance of doubt there is a separate Modification under the Significant Code Review (SCR) that will enact the REC v3.

Next Steps:

The Workgroup recommends that this modification should be subject to Self-Governance

The Panel will consider this Workgroup Report on 20 January 2022. The Panel will consider the recommendations and determine the appropriate next steps.

Impacted Parties:

High: Shippers; Suppliers
Low: Distribution Network Operators, Independent Gas Transporters, Consumers
None: National Grid Transmission

Impacted Codes:

Retail Energy Code (REC) will be implementing version 3.0. This will be introduced as part of the Significant Code Review (SCR).

Transitional arrangements are considered within REC Transition Schedule, in addition to the Ofgem Faster Switching Programme artefacts. Consequential impacts will be required to other Codes as a result of that implementation.

This Modification deals specifically with the impact to the UNC. Impacts to IGT UNC will need to be assessed during development of this Modification. An equivalent IGT UNC Modification will be developed as necessary.

Joint Office of Gas Transporters

Contents	

Timetable

Modification timetable:

Pre-Modification Discussed	23 September 2021
Date Modification Raised	11 October 2021
New Modification to be considered by Panel	21 October 2021
First Workgroup Meeting	28 October 2021
Workgroup Report to be presented to Panel	20 January 2022
Draft Modification Report issued for consultation	21 January 2022
Consultation Close-out for representations	11 February 2022
Final Modification Report available for Panel	16 February 2022
Modification Panel decision *(at short notice)*	17 February 2022

Any questions?

Contact:
Joint Office of Gas Transporters

enquiries@gasgovernance.co.uk

0121 288 2107

Proposer:
Gurvinder Dosanjh, Cadent

Gurvinder.Dosanjh@cadentgas.com

07773 151572

Transporter:
Gurvinder Dosanjh, Cadent

Systems Provider:
Xoserve

UKLink@xoserve.com

Other:
David Addison

david.addison@xoserve.com

07428 55 9800

1   Summary

What

Responsibility for mastering Registration data will transfer from the Uniform Network Code (UNC) to the Retail Energy Code (REC) following the implementation of the Central Switching Service (CSS).

In order to ensure the effective implementation of the CSS and the consequential changes to the UK Link systems, certain responsibilities will need to be discontinued in the UNC in advance of the CSS Implementation or suspended for a period in line with the transitional rules defined within the Ofgem Faster Switching Programme. These lower level detail rules are specified in the Programme artefact NG0103 – Transition Plan Runbook (available here: salesforce link). A copy of the document is published alongside the Modification.

Why

This Modification is required to amend the UNC to facilitate the transition and implementation of the CSS.

The implementation will mean that certain UNC processes will be suspended for a period prior to CSS Implementation. This suspension will either be temporary for implementation or before they are permanently ended in the UNC and replaced by processes in the REC as part of version 3.0 (REC v3) of that code.

This Modification is not seeking to implement the enduring change necessary to the UNC for REC v3. These changes will be introduced by a separate Modification under Ofgem's Significant Code Review (SCR).

How

The Modification will introduce Transitional Text to support CSS Implementation and transition to REC v3.0.

2   Governance

Justification for Self-Governance

This Modification is proposed to be subject to Self-Governance as it is a transitional Modification and consequently will not have a material or discriminatory impact. As such this does not meet any of the criteria that would require it being subject to Authority Direction.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- be assessed by a Workgroup.

3   Why Change?

This Modification is required to facilitate the smooth transition to CSS. It will describe the deadline for Shipper Users and Transporters to submit UNC transactions in order that they can be effective prior to the implementation of the CSS.

Without this Modification parties would still be entitled to submit UNC transactions until the SCR text is implemented.   If this were to be the case, Users may submit transactions that would otherwise become effective

after the CSS Implementation. This could lead to conflict of data between the UK Link system and the system responsible for Registration.

This change will ensure that data changes and Registrations are managed in the cutover period to CSS in line with the baselined programme approach through the Ofgem Faster Switching Programme artefacts. This Modification will ensure that the UNC is consistent with REC Transition Schedule drafting that places obligations on REC parties (Transporters and Suppliers – via their Shippers) to follow the instructions in DB4 and Runbook.

4   Code Specific Matters

Reference Documents

The following Ofgem Faster Switching Programme documents have been used to produce this Modification. The documents are lengthy and are published alongside the Modification.

1. Appendix 2: The Ofgem Faster Switching Programme artefact NG0103 – Transition Plan Runbook:

    The Faster Switching Programme Transitional arrangements are specified in the Transition Plan / Runbook. This document is intended to provide information describing the approach, management, and execution of the Transition Phase of the programme. The document can also be accessed here:

    https://switchingprogrammeportal.my.salesforce.com/sfc/p/#4J000000Fmw9/a/4J0000002BVy/MibkYl wGdTx7WH9vNMTp7Ec0dw6F1ohKqeIFH8Uo5I0

2. Appendix 3: D-4.3.4 E2E Transition Plan - Inflight Switches Management Approach:

    Further functional elaboration is provided around the management of specific transactions in D-4.3.4 E2E Transition Plan - Inflight Switches Management Approach. This document is available within the Ofgem Faster Switching Artefacts here:

    https://switchingprogrammeportal.my.salesforce.com/sfc/p/#4J000000Fmw9/a/4J0000002AkE/dp.w8v kB06RGIFemRck4w.gC38G4ilf0zL8RNgsa9Zg

3. Appendix 4: Request CRD-100:

    This Change Request is intended to clarify the final submission point of a number of UNC transactions. This Modification has been drafted assuming that this Change Request will be approved.

Knowledge/Skills

No specific knowledge or skills are identified.

5   Solution

This Modification is required in order to facilitate an orderly transition to Registration being Supplier led and mastered under the REC. This Modification only applies to the Supply Points included within the scope of the Central Switching Service (CSS Supply Points). The CSS is introduced to manage Registration transactions. This will replace the existing Registration activities in the UNC of Confirmation, Withdrawal, Objection and some other Supply Point Amendments, such as updates to Supplier Identity and Market Sector Code.

CDSP is required under the Retail Energy Code Transition arrangements to provide data to the CSS Provider in support of transition. As these arrangements are covered under the REC this Modification does not seek to further oblige the CDSP to provide this information. The data provided is currently maintained in the UK Link system by the CDSP with the exception of the Shipper-Supplier Association Data (SSAD). The SSAD requires

the Shipper to define Authorised Suppliers where such Suppliers may nominate a Shipper in a CSS Request. The SSAD information needs to be in place at CSS Implementation Date. The CDSP needs to receive the nominations from Shippers in advance of the CSS Implementation Date. These arrangements are not expected to be subject to frequent change. The Shipper should provide such nominations no later than the Association Data Deadline which will be communicated to Shipper Users by the CDSP, and should they be received after this deadline the CDSP has no obligation to amend the SSAD submitted to the CSS Provider that will be effective on the CSS Implementation Date.

These transition rules to the UNC do not apply to Supply Points not mastered under the REC (Non-CSS Supply Points)[1]. Non-CSS Supply Points include Shared Supply Points; Supplier Exempt Supply Points; NTS Direct Connect Supply Points and those provisioned with Liquified Petroleum Gas (LPG). The Non-CSS Supply Points will not be impacted by these UNC Transition Rules [other than Supply Points will not be able to transition between being a CSS and Non-CSS Supply Point within the Transition Period].

The terms 'CSS Supply Point' and 'Non CSS Supply Point' are defined within the existing UNC, therefore these definitions do not need to be established as part of the Transitional text.

The actual date implementation of the CSS is not currently known. Consequently, it is proposed that the implementation date is defined for the purposes of this Transition period as the Central Switching System Implementation Date (CSSID), and every date will be described in relation to this Date – e.g. CSSID-3 Supply Point System Business Days (SPSBDs).

For the avoidance of doubt, this Modification follows the principle that the implementation day will be a Monday. Consequently more general Non-Effective Days (i.e. impacting processes not specifically defined within this Modification) need not be taken.

In addition to the above solution requirements there are very detailed orchestration changes that need to be considered for specific UNC transactions. These are specified in Appendix 1, but still form part of the Solution component of this Modification.

Nominations and Offers are not expected to be impacted functionally for transition. Offers issued to a User prior to CSS will remain valid for the period of an Offer as defined currently within the UNC (up to 6 months (UNC TPD G 6.5.4), but subject to other criteria e.g. DM Capacity rules), however, where such Offers relate to CSS Supply Points the terminology will be amended to 'Detail Registration Response' (see SCR text – UNC TPD G 5.3.12). Consideration should be given within the Legal Text to clarification of the amended terminology.

Meter Reading rules are amended following CSS Implementation. For example, the current rules require that the Meter Reading is obtained within the Opening Read window of D-5 to D+5 Supply Point System Business Days (D being the Supply Point Registration Date) for Class 4 Supply Meter Points. Following CSS Implementation Readings will be sought for D, and they may not be taken in advance of D – but may be obtained and submitted up until D+10 SPSBDs. Where the Read Date is not D an estimate will be inserted for D. It is proposed that there are no Transitional Rules for Meter Reading amendments. From CSS Implementation Date the new Meter Reading rules shall apply.

Following CSS Implementation, the CDSP will stop issuing the XDO file to the DCC – holder of the Smart Communications Licence. A final issue of this file will be issued following completion of processing of key batches (e.g. Address, MAM Id) on or prior to CSS Implementation Date. This is currently a daily file. A schedule

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[1] For information, the CDSP Initiated Confirmations will be suspended for LPG Supply Meter Points from CSSID – 4SPSBPs until CSSID, but these Supply Meter Points are not defined in the UNC.

will be agreed with the DCC regarding submission of this data during the Transition Period. [It is not expected to be included within the Legal Text as it is not expected that this is defined within the UNC currently.]

Batch timings of the final submission deadline within day for Batch Transfer Communications prior to CSS Implementation Date will need to be assessed once further transition detail is made available. This will not impact the Legal Text, but the existing times stated in the UK Link Manual UKL CD1 - CODE COMMUNICATIONS REFERENCE document will need to be reviewed and potentially amended. The current stated timings are:

A Batch Transfer Communication may be made at any time, subject to the availability of the UK Link Network. There are no technical restrictions concerning the timing of Batch Transfer Communications. However, in order to guarantee that a Batch Transfer Communication is processed for that Supply Point System Business Day they need to be received by the CDSP by the following times on that Business Day:

CNF - Confirmations	23.00 hours
NOM – Nominations	23.00 hours
SPC - Supply Point Changes	23.00 hours
WAO - Withdrawals & Objections	23.00 hours
IAR - Isolations & Reconnections	23.00 hours
CNC - Customer Amendments	16.00 hours
EMC - Emergency Contacts	16.00 hours
RFA - Reference Amendment	16.00 hours
Meter Readings	21.00 hours]

6   Impacts & Other Considerations

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

Yes - This Modification is integral to the implementation of the REC version 3. The Authority are aware of this Modification and support this Modification being raised.

Consumer Impacts

This is a Transition Modification. There will be a short-term impact upon consumers as certain dates will not be available to consumers to switch their supply as the industry transitions to CSS.

This impact should be viewed in the wider context of the stated benefits of the Ofgem Switching Programme.

What is the current consumer experience and what would the new consumer experience be?

This is a Transition Modification. Impacts to consumer as a result of this Modification are expected to be minimal.

Impact of the change on Consumer Benefit Areas:	
Area	Identified impact
Improved safety and reliability No impact.	None

Lower bills than would otherwise be the case The Ofgem Switching Programme have claimed benefits of the broader Programme. These are not relevant for this Transition Modification.	None
Reduced environmental damage No impact.	None
Improved quality of service This Transition Modification will ensure that processes will be applied consistently with the REC Transition products – which will ensure clarity for industry parties and reduced risk of inconsistent processes being operated between UNC and REC.	Positive
Benefits for society as a whole No impact.	None

Cross-Code Impacts

A Transition Modification has been raised by the IGT UNC and the IGTs have been engaged during the Modification development to identify the exact of the impacts. IGT-UNC Modification 158[2] is the equivalent Modification and is currently at v2.0. A further revision is expected shortly. New connections in IGT UNC is handled differently to the UNC; additional legal text covers this off for the IGT-UNC. IGT-UNC Legal Text is expected shortly, to be reviewed in February 2022.

A similar Modification may be required to BSC and SEC. The impacts of these Modifications are expected to be discrete so should not require joint Workgroup meetings.

Any co-ordination with these Codes is being achieved through the Ofgem Faster Switching Programme Transitional Meetings.

EU Code Impacts

None identified.

Performance Assurance Considerations

Workgroup believed there were no Performance Assurance considerations relating to this Modification.

Workgroup Impact Assessment

There have been three Workgroup meetings for Modification 0784S in 2021 (October, November and December 2021) and one in 2022 (January 2022).

When the first draft of the text was produced for the Faster Switching SCR, the need for this Modification was made clear to Distribution Workgroup (March 2020). Once the detailed transition plans had been baselined through the REC Transition workstreams, the Modification was introduced via a pre-Modification discussion at

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[2] IGT-UNC Modification 158 https://www.igt-unc.co.uk/igt158-transition-to-the-central-switching-service-and-the-retail-energy-code-v3-0/

the September 2021 Distribution Workgroup where the preliminary slide deck was discussed with Workgroup Participants[3]. This UNC Modification was raised at the end of the summer 2021.

The Modification and the Slides which accompanied it each month have a good level of detail about the expected Legal Text and the areas of the Code to be impacted. As the Modification developed, Workgroup Participants were introduced to various points and changes made to enable the transition. Workgroup had the opportunity to consider the text and its implementation.

Visibility on the necessary transitional requirements have been shared within the Ofgem Faster Switching Programme workstreams.

Central Systems Impacts

There will be material impacts to the UK Link systems. These are catered for within the CSS Consequential Changes Programme managed within Data Services Contract (DSC). An impact assessment specifically for this Modification is consequently not expected.

Rough Order of Magnitude (ROM) Assessment

No ROM is required for this Modification because any system changes are included within the broader CSS programme activities[4].

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[3] Pre-Modification slides used at Distribution Workgroup September 2021:
https://www.gasgovernance.co.uk/sites/default/files/ggf/2021-09/1.5.3%20Transition%20for%20REC%20v3%20Go%20Live%20.pdf
[4] XRN 4922 https://www.xoserve.com/change/change-proposals/xrn-4922-review-of-the-cssc-central-switching-service-consequential-changes-shipper-business-requirements-document/

7   Relevant Objectives

Impact of the Modification on the Transporters' Relevant Objectives:

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

This Modification will enable effective transition to the revised Switching arrangements envisaged as part of the Ofgem Faster Switching Programme and the attendant stated benefits to promoting consumer switching. This Modification will also ensure clarity for Shipper Users with respect to the submission of impacted UNC transactions which will reduce impacts of this transition.

Workgroup agreed with the view of the Proposer in relation to Relevant Objective d) and all Workgroup Participants believed the Modification would also have a positive impact on Relevant Objective f).

8 Implementation

This Modification needs to insert the Transition text into the UNC sufficiently in advance of the CSS Implementation Date to ensure that the transaction may be dealt with accordingly.

Ideally the Modification will be decided by UNC Panel in sufficient time to allow the UNC appeal window to expire before the start of the transition period for CSS implementation. This is expected to be Monday 21 March 2022.

9 Legal Text

Legal Text has been provided by Cadent (on behalf of all GTs) and is published alongside this report. The Workgroup has considered the Legal Text on 13 January 2022 and is satisfied that it meets the intent of the Solution.

10 Recommendations

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that:

- This Self-Governance modification should proceed to consultation (Workgroup Participants suggested 15 days duration and consideration at short notice at February 2022 Panel) .

Joint Office of Gas Transporters

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Appendices

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Appendix 1 - Detailed Transactional Solution Rules

This table is provided to supplement the Solution section of this Modification:

Key:

	Legal Text expected within the Transitional Rules
	No Legal Text expected within the Transition Rules
CSS ID	CSS Implementation Date
SPSBD	Supply Point System Business Day(s)
D	Calendar Day(s)

Process	Sub Process	UNC Code Reference	Business Rule	Processing Date	Action Subsequent to Last Processing Date
Confirmations		G 6.6.8 a	Confirmation must be submitted and Proposed Supply Point Registration Date must be on or prior to CSSID.	From the day following CSSID-[30]SPSBDs CDSP will reject Confirmations with a Proposed Supply Point Registration Date greater than CSSID	As stated.
		G 6.6.8 b		Last Processing Date: CSSID – [14]Ds (excl submission day)	CDSP will reject any Confirmations either:

					- Because minimum period is not observed (existing validation) - Proposed Supply Point Registration Date greater than CSSID (Transition only)
	Supply Point Withdrawal submitted by Registered User (but has not become an Effective Supply Point Withdrawal (see below))	G 6.6.8 b i	Defines Last Processing Date	Last Processing Date: CSSID – [4]SPSBDs (excl submission date)	
	'Re-confirmation' – i.e. No change of User	G 6.6.8 b ii			
	Initial Registration				
	Effective Supply Point Withdrawal (G6.12.1) - (i.e. Isolated and Withdrawn)				
Transporter / CDSP Initiated Registrations		Within the UNC the CDSP is granted authority to register Supply Meter Points (UNC TPD G4.4.4; G4.6.11; G8.2.4;	Defines Last Processing Date – but this is for information only, as no Legal Text is expected as the timescales are not currently specified in the UNC	Last Processing Date prior to CSS: CSSID – [4] SPSBDs For information, it is anticipated that CDSP Initiated Registrations with resume on CSSID + [0]SPSBDs.	Transition text describes CDSP ability to stop processing from LPD.

		G8.4.3; G8.5.4)			
Maintenance of the Supplier Identity		G 6.6.10	Last Processing Date of Supplier identity Amendment via a Confirmation.	Last Processing Date prior to CSSID will be defined based upon the rules above within the Confirmation Section.	Any Supplier identity updates will need to be managed by the Supplier via a Switch Request to CSS under the REC.
			Last Processing Date of Supply Point Amendment (GEA) to notify the identity of the Supplier	Last Processing Date prior to CSSID – [3] SPSBDs where Supplier Effective Date is on or before CSSID	Transition text describes CDSP ability to stop processing from LPD.
			Cancellation of any accepted Supplier Supply Point Amendments where they have yet to become effective and will not become effective on or prior to CSSID	This will be applied following Last Processing of GEA transactions notifying the amendment of the Supplier	*Note: the means of communication of this will not be via Batch UK Link Communication* Transition text describes CDSP ability to lapse any future dated Supplier Supply Point Amendments.
Withdrawal Submission		G 6.11.2	Defines Last Processing Date	Last Processing Date: CSSID – [3] SBSBDs [Note: timescale is not specified in the UNC]	CDSP will reject any Withdrawals following LPD.
					Suppliers will need to hold and submit Registration Deactivation Requests post CSS ID.

Accepted Withdrawals that have yet to become an Effective Supply Point Withdrawal (G6.12.1) (i.e. Isolated and Withdrawn)		G 6.12.1	Cancellation of any Withdrawals that have yet to become effective. Following processing of the last Withdrawal files where these cannot be an Effective Supply Point Withdrawal prior to CSS Go Live such Withdrawals will have no effect, and so will be cancelled (after conclusion of above on CSSID – [3] SPSBD).	Following processing of final Withdrawal Submission (see line above) this will cancel any Withdrawals that not be able to become Effective Supply Point Withdrawals (i.e. the Supply Point hasn't already been subject to Isolation (see G 7.2 – note timings as Isolation transaction processing date +1D (G 7.2.3)).	Transition text describes the CDSP ability to lapse Withdrawals that cannot become an Effective Supply Point Withdrawal.
					Suppliers will need to submit Registration Deactivation Requests in REC post CSS ID.
					Note: the means of communication of this will not be via Batch UK Link Communication as stipulated in UKL CD1 - CODE COMMUNICATIONS REFERENCE document (line 316) **No Legal Text expected as this is currently detailed in UK Link Manual.**
Isolations (to complete an Effective Supply Point Withdrawal)		G 7, specifically G 7.2.3 refers to timings	Whilst processing of RGMA Transactions are unaffected by these Transition Rules, in order for an Isolation to be effective such that this will considered to enable an Effective Supply Point Withdrawal these must be	Last Processing Date: CSSID – [3] SPSBDs [Note: timescales are a concatenation of 'Withdrawal Submission' timings (not stated in UNC) and Isolation timings (defined in Code)].	Any RGMA transactions submitted after this date will still effect the Isolation, but the Effective Supply Point Withdrawal will not be enacted under the UNC, and this will need to be enacted by a Supplier using the Registration

			submitted by CSS ID – [3] SPSBDs.		Deactivation Requests in REC post CSS ID.
Utilisation of the Withdrawal Process to initiate the Erroneous Confirmation Process	Where a User has submitted a Confirmation but this Meter Point has never had a Meter fitted nor the CDSP has received any communication that a Meter has ever been fitted (including C&D Notices) then the Withdrawal is effected.	N/A – this is process is not detailed in the UNC	Post CSS Go-Live submission of the S39 Record (which is currently used to effect withdrawals) will have the effect of amending the Registerable Meter Point (RMP[5]) Status to Dormant (subject to no Meter having been fitted or ever having been notified as fitted) to allow a Request Deactivation Request under CSS.	From CSSID – [2] SBSBDs submission of an accepted S39 Record will effect the necessary RMP Status.	No Legal Text expected as this is not currently included in UNC. Following acceptance of such transactions the Supplier will need to submit a Registration Deactivation Request via CSS.
Market Sector Code		G 3.3.2	Post CSS the Market Sector Code will be mastered in REC.	Last Processing Date: CSSID – [3] SPSBDs.	Market Sector Code Notifications (MSI) will not be accepted from LPD. Any RGMA transactions submitted after this date will ignore any amendment to the Market Sector Code.

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[5] RMP is the REC term applied to both electricity and gas network offtake i.e. a Supply Meter Point in the gas context.

Appendix 2 – The Ofgem Faster Switching Programme artefact NG0103 – Transition Plan Runbook

Please find this published alongside the Modification.

Appendix 3 - D-4.3.4 E2E Transition Plan - Inflight Switches Management Approach

Please find this published alongside the Modification.

Appendix 4: Request CRD-100:

Please find this published alongside the Modification.