

CODE MODIFICATION PROPOSAL No 0226
Additional Data Requirements for the Administration of CSEP Supply Points
Version 1.0

Date: 30/09/2008
Proposed Implementation Date: To be identified
Urgency: Non Urgent

1 The Modification Proposal

a) Nature and Purpose of this Proposal

UNC Review Group 0157 “Review of IGT Settlement and Reconciliation Arrangements” identified a number of issues that potentially contribute to the apparent discrepancy between the number of Connected System Exit Point (CSEP) Supply Points registered on independent Gas Transporter (iGT) and Distribution Network Operator (DNO) records respectively. Such a discrepancy is currently present at both an aggregate level and per User to varying degrees. To minimise these discrepancies, it is critical that the DNOs’ agent can easily identify the relevant connection point to which the iGT is referring to in its initial notification to the DNOs’ agent of a new Supply Point at a CSEP network.

In absence of a unique data item that remains constant throughout the lifecycle of that CSEP, the existing data provision requirements does not allow the DNOs’ agent to easily identify the connection point (that has been authorised by the DNO as completed in accordance with expectation) to which the iGT is referring. Accordingly, Review Group 0157 identified that the DNO Reference number (which is utilised by the DNO throughout the initial connections quotation/acceptance/construction phase) is the one constant data item that would enable the DNOs’ agent to more easily identify the correct connection point.

As a consequence of the findings of the Review Group, a number of iGTs voluntarily agreed (as a trial) to provide the DNO Reference in their D01 (new Logical Meter Number Request) submissions by populating an optional ‘free text’ field within the file. Thereby, where an approved connection was unable to be identified utilising the existing DNO agent’s systematised matching validation, a manual check against the DNO reference specified has enabled the DNOs’ agent to more quickly identify the correct connection.

To realise the full benefits, it is therefore proposed that the iGT be mandated to provide the following additional data within the D01 submission to the DNOs' agent:

- the DNO reference
 - for 'lead' iGTs this is the reference allocated by the DNO in respect of the connection to the DNO's network
 - for 'nesting' iGTs this is the DNO reference allocated in respect of the upstream connection to the relevant DNO network (ie: the lead iGT)*
- the identity of the relevant LDZ
- whether the CSEP is a nested arrangement ('y' or 'n')

The final additional data requirement will allow 'nested' iGTs to interact directly with DNOs to register load details. However*, to enable the DNOs to monitor aggregate load registered to a particular CSEP it is necessary for such a nested iGT to specify the DNO reference allocated to the upstream connection to the relevant DNO network (ie: the first connecting iGT).

In the event of implementation, system validation will be introduced to reject files where the DNO reference specified does not match a DNO reference specified by the relevant DNO as a 'valid' connection.

The Review Group also identified that the DNOs are not currently required to provide a response to the iGT submission of individual meter point reconciliation volumes at Larger Supply Points. Therefore it is further proposed that DNOs are mandated to provide a response to the iGT (following the submission of a reconciliation volume) to confirm acceptance or rejection of the file and if rejection, the reason for rejection.

The relevant iGT / DNO communications are detailed within the LDZ CSEP Network Exit Agreement (NExA) and accordingly the appropriate changes would need to be reflected within Annex A of this Agreement.

b) Justification for Urgency and recommendation on the procedure and timetable to be followed (if applicable)

N/A

c) Recommendation on whether this Proposal should proceed to the review procedures, the Development Phase, the Consultation Phase or be referred to a Workstream for discussion.

A draft version of this proposal has been presented at both the Ofgem CSEP group and the UNC Distribution Workstream where no significant issues were raised. Accordingly, the proposer believes the proposal is sufficiently clear and developed to enable it proceed directly to consultation.

2 Extent to which implementation of this Modification Proposal would better facilitate the achievement (for the purposes of each Transporter's Licence) of the Relevant Objectives

The transfer of a sufficient level of data between iGTs and DNOs to enable all parties to update systems in a timely manner is essential to ensure compliance with the provisions contained within Annex A of the LDZ CSEP NExA. Furthermore, the passing of data directly impacts on the efficient operation of the UNC by DNOs, particularly concerning the levying by DNOs of accurate transportation invoices to Users. It is therefore essential that the appropriate communication requirements are reflected within the LDZ CSEP NExA.

Implementation of this Modification Proposal can therefore be expected to facilitate Standard Special Condition A11.1 (f) of the GT Licence: so far as is consistent with subparagraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code.

3 The implications of implementing this Modification Proposal on security of supply, operation of the Total System and industry fragmentation

No such implications have been identified.

4 The implications for Transporters and each Transporter of implementing this Modification Proposal, including:

a) The implications for operation of the System:

No such implications have been identified.

b) The development and capital cost and operating cost implications:

There would be a development cost associated with the modification of DNO systems to recognise and process the additional data items within the D01 file and the additional communication required to be issued in response to the submission of a J82 reconciliation volume submission file.

c) Whether it is appropriate to recover all or any of the costs and, if so, a proposal for the most appropriate way for these costs to be recovered:

It is not anticipated that any additional cost recovery would be required.

d) The consequence (if any) on the level of contractual risk of each Transporter under the Uniform Network Code of the Individual Network Codes proposed to be modified by this Modification Proposal

It is anticipated that Transporters level of contractual risk would reduce as a consequence of implementation by achieving more timely registration of CSEP load on DNO systems. UNC Transporters would therefore recover appropriate transportation charges.

5 The extent to which the implementation is required to enable each Transporter to facilitate compliance with a safety notice from the Health and Safety Executive pursuant to Standard Condition A11 (14) (Transporters Only)

Implementation is not required to facilitate such compliance.

6 The development implications and other implications for the UK Link System of the Transporter, related computer systems of each Transporter and related computer systems of Users

Changes will be required to the CSEPs database (a related computer system) to accommodate and process the additional data items and data flows.

7 The implications for Users of implementing the Modification Proposal, including:

a) The administrative and operational implications (including impact upon manual processes and procedures)

No such implications have been identified.

b) The development and capital cost and operating cost implications

No such development or capital costs have been identified.

c) The consequence (if any) on the level of contractual risk of Users under the Uniform Network Code of the Individual Network Codes proposed to be modified by this Modification Proposal

It is anticipated that implementation would reduce discrepancies in a User's Supply Point count between DNO and iGT records and thereby reduce the risk of incurring inappropriate charges pursuant to the provisions of the respective industry codes.

8 The implications of the implementation for other relevant persons (including, but without limitation, Users, Connected System Operators, Consumers, Terminal Operators, Storage Operators, Suppliers and producers and, to the extent not so otherwise addressed, any Non-Code Party)

iGTs would be required to amend their systems to deliver the additional mandatory data requirements and to receive and process the reconciliation response communication from the DNO.

9 Consequences on the legislative and regulatory obligations and contractual relationships of the Transporters

Appropriate changes would be required to the LDZ CSEP NExA, the primary iGT/DNO contract.

10 Analysis of any advantages or disadvantages of implementation of the Modification Proposal not otherwise identified in paragraphs 2 to 9 above

Advantages

- Increases the efficiency with which the DNOs' agent is able to match the iGT request to the correct DNO approved connection.
- If the DNOs' agent is unable to do this, it increases the efficiency with which the issue can be resolved by the iGT and the DNO. For example, the DNO reference the iGT is submitting may have been superseded by another DNO reference due to, for instance, the expiry of the initial quotation which is easily linked to the subsequent DNO reference.
- Provides confirmation to iGTs of the successful or unsuccessful processing of reconciliation of Larger Supply Points at CSEPs enabling the iGT to resubmit where necessary.

Disadvantages

- No disadvantages have been identified.

11 Summary of representations received as a result of consultation by the Proposer (to the extent that the import of those representations are not reflected elsewhere in this Proposal)

No such consultation has been issued.

12 Detail of all other representations received and considered by the Proposer

No such representations have been received.

13 Any other matter the Proposer considers needs to be addressed

No other matter has been identified.

14 Recommendations on the time scale for the implementation of the whole or any part of this Modification Proposal

To be advised by the DNOs' agent / iGTs.

15 Comments on Suggested Text

N/A

16 Suggested Text

N/A

Code Concerned, sections and paragraphs

Uniform Network Code

Section(s) LDZ CSEP NExA Annex A

Proposer's Representative

Chris Warner (National Grid Distribution)

Proposer

Chris Warner (National Grid Distribution)