

0386:

Extending rights to Protected Information provisions for Meter Asset Managers / Registered Metering Applicants – unpopulated MAM id records



This modification is intended to permit the release of the supplier id to a MAM / RMA (following a request from the MAM/ RMA) in circumstances where no current MAM Id is held on central systems. The release of data is limited to Lloyds registered MAMs and would be on an individual MPRN request basis.



Panel determined that this modification be implemented.



High Impact:
N/A



Medium Impact:
N/A



Low Impact:
Transporters' Agent

Contents

- 1 Summary
- 2 Why Change?
- 3 Solution
- 4 Relevant Objectives
- 5 Impacts and Costs
- 6 Implementation
- 7 The Case for Change
- 8 Legal Text
- 9 Consultation Responses
- 10 Panel Discussions
- 11 Recommendations

Error! Bookmark not defined.



3 Any questions?

4 Contact:
Joint Office



5
6 enquiries@gasgovernance.co.uk

8
12  0121 623 2115

13 Proposer:
Martin Brandt



14
15 martin.brandt@sse.com



18 01256 304304

xoserve:
Andy Miller



commercial.enquiries@Xoserve.com

About this document:

This document is a Final Modification Report, presented to the Panel on 15 September 2011.

The Panel will consider the views presented and decide whether or not this self-governance change should be made.

0386

Final Modification Report

15 September 2011

Version 3.0

Page 2 of 18

© 2011 all rights reserved

1 Summary

Is this a Self-Governance Modification

The Modification Panel determined that this is a Self-Governance Modification.

Why Change?

Current provisions in the UNC permit the release of supplier and meter asset information to a MAM where they are recorded as the registered MAM on the central systems (also referred to as the supply point register) operated by Xoserve.

There are and will be instances where the MAM id is not populated and a MAM cannot be provided with any information. In May 2011 circa 263,000 supply meter points did not have a MAM id assigned to them.¹

The MAM is therefore unable to establish the identity of the supplier to the meter and to take the necessary action to establish the nature of their records and if required complete commercial arrangements for metering services and ensure data accuracy between industry participant systems.

This modification would, with sufficient controls in place, permit the release of the supplier id, meter serial number and meter model by the Transporter to a requesting MAM.

At the June 2011 Modification Panel, Ofgem asked National Grid to confirm if the UNC already permitted the release of this data to an enquiring MAM where the MAM id is blank on the central systems. National Grid has confirmed that the UNC does not permit the release of this data and, therefore, this modification is required to enact the service described in this modification proposal.

Solution

Provide a provision in Section V of the UNC to permit the release of supplier id, meter serial number and meter model to an enquiring MAM where the MAM id is not populated on the central systems operated by Xoserve.

Impacts & Costs

The costs incurred by the Transporters' agent in dealing with enquiries and reporting requirements would be recovered from the requesting MAM.

Implementation

As a Self-Governance Modification, this modification could be implemented 16 days after a Panel decision to do so.

The Case for Change

This modification would provide a more efficient mechanism for resolving the situation of missing MAM ids on central systems, as it would enable the Transporters' Agent to release the identity of the Supplier and the relevant meter serial number to a MAM when provided with the MPRN, where the MAM id is blank on the central systems.

¹ Source Xoserve, May 2011

2 Why Change?

The responsibility for populating the MAM Id on central systems rests with the supplier/shipper supplying the supply meter point.

Currently, Meter Asset Managers have great difficulty in identifying a supplier to a meter where the supplier (via their shipper) has not populated the MAM Id data on the central systems. As a result, data inaccuracies persist and in the event of a change of supplier activity the incoming shipper/supplier will not know the identity of the MAM.

This modification would enable MAMs to contact the supplier and establish the correct data and commercial records as necessary.

In May 2011 there were circa 263,000 supply meter points where the MAM Id has not been populated on central systems.

There is a view that suggests where a shipper/supplier acquires a supply point where the MAM Id has not been populated by the current supplier, that the incoming shipper/supplier are unable to identify the MAM and cannot establish commercial arrangements.

In some cases SSP consumers may be affected as supply meter points without a MAM id populated against them on central systems are excluded from the PEMS arrangements and in the event of a gas leak on the meter, the meter is made safe and the consumer left to contact their Supplier to request a meter exchange.

This modification would reduce this number of meter points on central systems without a MAM Id and provide a more efficient route to identify the relevant supplier.

It is expected that the Supplier held on central systems would establish commercial arrangements with the MAM. This will then lead to the population of a MAM id on central systems.

The modification may also improve the quality of data on industry participant systems and reduce the risk of duplicate records.

The Workgroup noted that the provision of data would be subject to a bi-lateral agreement between the requesting MAM and Xoserve.

3 Solution

The proposed solution is to amend UNC section V to permit the release of data to an enquiring MAM where the MAM id has not been populated on the central systems.

The enquiring MAM would be validated as a valid MAM by checking against the Lloyds Register of approved MAMs. See

<http://www.lr.org/sectors/utilities/schemes/mamcop.aspx>

If implemented, MAMs would contact Xoserve with MPRNs for which they cannot identify the supplier to request supplier id information. Where the MAM id on central systems is not populated Xoserve shall provide the supplier id, meter serial number and meter model to the enquiring MAM. The MAM must provide the specific MPRN against which they wish to enquire. A request by a MAM for a general enquiry against all MPRNs where the MAM id is not populated would not be accepted.

4 Relevant Objectives

Implementation will better facilitate the achievement of **Relevant Objectives d and**

The benefits against the Code Relevant Objectives	
Description of 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.	Improvements to the change of supplier and MAM appoint/de-appoint process are expected
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.	Improvements may occur in this area
f) Promotion of efficiency in the implementation and administration of the Code	None

d) Securing of effective competition.

Improvements to the change of supplier and MAM appoint/de-appoint process would be expected as MAMs and Suppliers enter into arrangements and therefore update records. This will help to minimise the administration and costs associated with the change of supplier process.

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.

The provision of more accurate data is likely to benefit Suppliers meeting their obligations for Standards of Service.

In its response, Corona Energy agrees that the modification would better facilitate the achievement of relevant objective (d) as they believe it provides for more accurate registered MAM (Meter Asset Manager) information within the Supply Point Register thereby facilitating the change of supplier process, supporting metering competition and potentially reducing Shipper costs associated with maintaining customer records.

In its response, E.ON UK also agrees with the proposer that the modification would better facilitate the achievement of relevant objective (d) as they believe it helps to ensure that suppliers have proper arrangements in place for the metering services they receive.

Gazprom, Meter Fit North West, RWE npower, ScottishPower and Scotia Gas Networks all agree with the proposer that implementation of the modification would better facilitate the achievement of relevant objective (d) by improvements in areas such as data quality and reduction of industry costs. Meter Fit North West go on the state that they believe that the modification also enables the MAMs to be aware that they are appointed for both commercial and health and safety reasons. Npower acknowledge that the modification provides a helpful remedy to the existing problems, but do not believe it provides a cure, as it does not provide a complete solution to the data quality issues faced by the industry in this area. Scotia Gas Networks also observe that the establishment of more accurate data is likely to assist Suppliers in meeting their Standards of Service obligations.

In its response, National Grid Distribution agrees with the proposer that the modification would better facilitate the achievement of relevant objective (d) as it provides for the release of relevant Meter Information and Supplier identities to MAMs where the MAM id has not been populated on the central systems.

National Grid Metering suggests that the efficacy of the proposal in meeting the relevant objectives will in part depend on the level of charges applied for the new service for responding to relevant information requests.

5 Impacts and Costs

Consideration of Wider Industry Impacts

Implementation would not be expected to be inconsistent with any wider industry developments.

Costs

As a "permissions" only modification no costs are anticipated.

Indicative industry costs – User Pays	
Classification of the Proposal as User Pays or not and justification for classification	
There are no costs associated with the implementation of this proposal to UNC parties and it is not classified as User Pays	
Identification of Users, proposed split of the recovery between Gas Transporters and Users for User Pays costs and justification	
Not applicable	
Proposed charge(s) for application of Users Pays charges to Shippers	
Not applicable. If any costs were to arise as a result of Xoserve providing this services these costs would be recovered from Meter Asset Managers	
Proposed charge for inclusion in ACS – to be completed upon receipt of cost estimate from Xoserve	

Impacts

Impact on Transporters' Systems and Process	
Transporters' System/Process	Potential impact
UK Link	• None
Operational Processes	• None
User Pays implications	• None

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	• None expected
Development, capital and operating costs	• None expected
Contractual risks	• None expected
Legislative, regulatory and contractual obligations and relationships	• None expected



Where can I find details of the UNC Standards of Service?

In the Revised FMR for Transco's Network Code Modification

0565 Transco Proposal for Revision of Network Code Standards of Service

at the following location:

<http://www.gasgovernance.co.uk/sites/default/files/0565.zip>

Impact on Transporters	
Area of Transporters' business	Potential impact
System operation	• None
Development, capital and operating costs	• None
Recovery of costs	• None
Price regulation	• None
Contractual risks	• None
Legislative, regulatory and contractual obligations and relationships	• None
Standards of service	• None

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	• None
UNC Committees	• None
General administration	• None

Impact on Code	
Code section	Potential impact
TPD V	Revision to permit the release of data

Impact on UNC Related Documents and Other Referenced Documents	
Related Document	Potential impact
Network Entry Agreement (TPD I1.3)	None
Network Exit Agreement (Including Connected System Exit Points) (TPD J1.5.4)	None
Storage Connection Agreement (TPD R1.3.1)	None
UK Link Manual (TPD U1.4)	None
Network Code Operations Reporting Manual (TPD V12)	None
Network Code Validation Rules (TPD V12)	None
ECQ Methodology (TPD V12)	None

Impact on UNC Related Documents and Other Referenced Documents	
Measurement Error Notification Guidelines (TPD V12)	None
Energy Balancing Credit Rules (TPD X2.1)	None
Uniform Network Code Standards of Service (Various)	None

Impact on Core Industry Documents and other documents	
Document	Potential impact
Safety Case or other document under Gas Safety (Management) Regulations	None
Gas Transporter Licence	None

Other Impacts	
Item impacted	Potential impact
Security of Supply	None
Operation of the Total System	None
Industry fragmentation	None
Terminal operators, consumers, connected system operators, suppliers, producers and other non code parties	None

In their respective responses, both Corona Energy and National Grid Metering believe that there is a potential to reduce administration costs should the change be implemented. However, National Grid Metering also believe that there, may be minor process modification costs to facilitate requests for Supplier IDs.

6 Implementation

Implementation Date

As a Self-Governance Modification, this modification could be implemented 16 days after a Panel decision to do so.

7 The Case for Change

Nothing additional to that identified above.

0386

Final Modification Report

15 September 2011

Version 3.0

Page 13 of 18

© 2011 all rights reserved

UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT

SECTION V - GENERAL

5 INFORMATION AND CONFIDENTIALITY

5.11 Disclosure of Supply Meter Point Information (Annex V-5)

- 5.11.1 Where in respect of any Supply Point the Transporter is requested by a Registered Metering Applicant to disclose to such Registered Metering Applicant the information detailed in Annex V-5 ("**Supply Meter Point Information**") then the Registered User of such Supply Point agrees that any such request will be regarded as made on behalf of such Registered User and accordingly the Transporter is authorised by such Registered User to disclose such Supply Meter Point Information to the Registered Metering Applicant in accordance with such request.
- 5.11.2 For the purposes of paragraph 5.11.1, "**Registered Metering Applicant**" is any person who is registered to request and receive Supply Meter Point Information from the Transporter or any person who is not currently registered to request and receive Supply Meter Point Information but such request relates to a period when they were previously registered to request and receive Supply Meter Point Information pursuant to an appropriate registration scheme administered by the Transporter.
- 5.11.3 Where in respect of any Supply Point for which details of the relevant Meter Asset Manager are not populated in the Supply Point Register the Transporter is requested by an Accredited Meter Asset Manager to disclose information in relation thereto to such Accredited Meter Asset Manager, then provided the Accredited Meter Asset Manager notifies the relevant meter point reference number for each relevant Supply Meter Point comprised within such Supply Point to the Transporter the Registered User of such Supply Point agrees that any such request will be regarded as made on behalf of such Registered User and accordingly the Transporter is authorised by such Registered User to disclose the following items of information in respect of each Supply Meter Point comprised in the Supply Point Registration for such Supply Point to the Accredited Meter Asset Manager in accordance with such request:
- (a) meter serial number;
 - (b) supplier; and
 - (c) model (meter).
- 5.11.4 For the purposes of paragraph 5.11.3, "**Accredited Meter Asset Manager**" is a Meter Asset Manager that is listed on the Ofgem MAM Registration Scheme listing of accredited Meter Asset Managers published by Lloyds Register.

9 Consultation Responses

Representations were received from the following parties:

Respondent	
Company/Organisation Name	Support Implementation or not?
Association of Meter Operators	Support
Corona Energy	Support
E.ON UK	Support
Gazprom	Support
Meter Fit North West Ltd	Support
National Grid Distribution	Support
National Grid Metering	Support
RWE npower	Qualified Support
ScottishPower	Support
Scotia Gas Networks	Support
SSE	Support

Of the 11 representations received, 10 supported implementation and 1 offered qualified support.

Summary Comments

The Association of Meter Operators believe that the modification enables MAMs & MAPs to track assets accurately and as a consequence recharge the correct Supplier for the use of the meter.

Corona believe that the modification would allow MAMs to facilitate the updating of missing Supply Point Register information thereby improving the change of supplier (CoS) process whilst supporting metering competition.

E.ON believe that, in allowing the Transporter to release the supplier identity and meter details to an approved MAM, the modification would enable the correct and appropriate arrangements to be in place to support metering services whilst promoting an efficient means for improving data quality for all concerned.

Gazprom believe that the modification would allow for an improved population of MAM IDs which would aid a more efficient change of Supplier process as it potentially avoids problems associated with a new Supplier not being provided with the current MAM ID. They also believe that with sufficient controls in place, the modification would permit the Transporter to release information such as the supplier ID, meter serial number and model to the requesting MAM, hopefully leading to a reduction of MPRNs without an associated MAM ID.

Meter Fit North West Ltd believe the modification would enable MAMs to identify the correct Supplier and to be aware that they are appointed for both commercial and health and safety reasons.

National Grid Distribution note that the current 'protected information' provisions contained within V5.11 do not permit the release of data to a RMA (Registered Meter Applicant) which constitutes a Meter Asset Manager (MAM) where the MAM identity is not populated on the Supply Point Register. It has been identified that approximately 263,000 Supply Meter Points do not have a MAM identity recorded against them. In these circumstances, they understand significant difficulty is experienced by MAMs with some organisations resorting to contacting all suppliers to try to identify the relevant supplier. NGD believe that this is clearly an unsatisfactory situation which can be simply remedied by modifying the UNC to permit large Transporters to release the supplier identity, meter serial number and meter model to a valid MAM where the enquiring MAM provides a Meter Point Reference Number (MPRN) to which there is no MAM registered on the Supply Point Register. Thereafter, NGD believe that implementation of the modification would ensure that MAMs would be able to identify the supplier to a Supply Meter and establish relevant arrangements whilst there is also a potential for improved quality of data contained on the Supply Point Register which could facilitate subsequent processes e.g. change of supplier events.

National Grid Metering believe that this facilitating modification would introduce a service which should reduce the number of meter points where no valid metering arrangements exist, thus enabling Suppliers to comply with their licence obligations to have an appointed MAM. Additionally, NGM believe the modification may potentially reduce the administration costs (for MAMs) associated with resolving queries and pursuing rental arrangements.

In offering only qualified support, RWE npower are of the view that whilst the modification provides MAMs with a means of addressing blank MAM IDs and therefore potentially lead to improvements in industry data quality they remain concerned about potential Data Protection implications relating to allowing MAMs access to the data.

RWE npower go on to request that a view on the Data Protection implications of giving MAMs access to this data, which is classed as personal data under the Data Protection Act is included within the Final Modification Report. Furthermore, as this is an enabling modification, in that it facilitates the provision of information by the Transporters' Agent to enquiring MAMs, which they assume would be a telephone service, they would also like this to be made explicit in the FMR.

ScottishPower believe that this modification, alongside other related industry initiatives, provides an opportunity to reduce the number of unpopulated MAM IDs.

Scotia Gas Networks believe that whilst allowing MAMs to contact the supplier and establish the correct data and commercial records, it may also enable improvements in data quality on the various industry participants systems thereby reducing the risk of duplication.

As proposer of the modification, SSE believe the implementation of the modification would help reduce the number of instances where the MAM id is blank on the Xoserve systems.

10 Panel Discussion

The Chair summarised that this is a facilitating modification – implementation would permit, but not require, the release of supplier id, meter serial number and meter model to an enquiring MAM where the MAM id is not populated on the central systems operated by Xoserve.

Members recognised that implementation would be consistent with efficient administration and implementation of the Code since it would facilitate the subsequent release of data without the need to approach all service providers. It was also recognised that this subsequent data release would be expected to enhance data quality and support the change of supplier process. Implementation would therefore be consistent with facilitating the securing of effective competition between Shippers and between Suppliers.

With 11 votes cast in favour, Panel Members unanimously determined that Self-Governance Modification 0386 be implemented.

Implementation could better facilitate the achievement of **Relevant Objectives d and f.**

The benefits against the Code Relevant Objectives	
Description of 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.	Yes
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	Yes

11 Recommendations

Panel Decision

Panel Members determined that Self-Governance Modification 0386 be implemented