

Stage 03: Draft Modification Report

0416S:

Extending the data provision permissions created by Modification 0279 regarding historic asset and read data provision

At what stage is this document in the process?



This modification seeks to extend the data provision permissions created by Modification 0279 and permit the release of data as an ongoing arrangement rather than the existing annual arrangement. In addition two non-Code User Pays services shall be created for a monthly and quarterly service.



Responses invited by 07 September 2012.



High Impact: -



Medium Impact: -



Low Impact: Shippers and Xoserve

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About this document:

This document is a Draft Modification Report, which was issued for consultation responses, at the request of the Panel on 19 July 2012. The close-out date for responses is 07 September 2012. The Panel will consider the responses and agree whether or not this self-governance modification should be made.



3 **Any questions?**

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1 Summary

Is this a Self-Governance Modification?

The Modification Panel determined that this is a self-governance modification.

Why Change?

Currently the UNC provides for an annual service for the provision of the historic asset and read information to Shippers. However, Shippers have advised that data issues with recently acquired sites could be resolved sooner if this historic asset and read information was available throughout the year. The resolution of discrepancies in asset data and the provision of historic read information will assist Shippers with the AQ review.

Solution

There are 2 key component parts to the solution of this modification:

- 1) Amendment to UNC TPD Section V to create the necessary permissions for the historic data to be provided to the current Registered User; and
- 2) An amendment to TPD section G1.6.21 – G1.6.25 to remove the annual service from the UNC.

In addition, and outside of the UNC, two Non-Code User Pays services are to be created, an annual monthly service (12 reports per year) for the forthcoming year, and an annual quarterly service (4 reports per year) for the forthcoming year. On implementation of this modification the two Non-Code services will be added to the Services Schedule for the Provision of Non-Code User Pays Services and included in the Agency Charging Statement (in conjunction with any necessary discussions with the User Pays User Committee).

The file format for the Non-Code User Pays Services will be the same as that provided for Modification Proposal 0279 (i.e. no development required).

This historic data can be provided for a maximum period of three years prior to the current Registered Users confirmation effective date.

Note: sites connected directly to the NTS are excluded from this proposal.

Impacts and Costs

There are no development or implementation costs associated with the proposed changes to the UNC.

Two new Non-Code User Pays Services will be created:

- i) an annual monthly service (12 reports per year), and;
- ii) an annual quarterly report (4 reports per year).

The report has already been developed under Modification 0279, so any additional costs will be associated with the delivery of the report on a more frequent basis.

Implementation

As this is a self-governance modification, implementation could be 16 business days after a Modification Panel decision to implement.

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The Case for Change

Shippers have advised that on acquiring a site they are unable to assess if there are any data discrepancies until receipt of the annual report in May or June each year. The ability to request and be provided with this data throughout the year will lead to a quicker resolution of data discrepancies and minimise the impact of such data discrepancies.

Recommendations

All parties are invited to consider whether they wish to submit views regarding this self-governance modification.

2 Why Change?

Currently the UNC provides for an annual service for the provision of the historic asset and read information to Shippers. However, Shippers have advised that data issues with recently acquired sites could be resolved sooner if this historic asset and read information was available throughout the year. The resolution of discrepancies in asset data and the provision of historic read information will assist Shippers with the AQ review.

3 Solution

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This historic data can be provided for a maximum period of three years prior to the current Registered Users confirmation effective date.

Note: sites connected directly to the NTS are excluded from this proposal.

For information and as an example, if a User requests the annual monthly service commencing in April the process would be as follows:

On the first business day in May 2012 the system is programmed to identify and supply points gained in the month of April 2012. The system will then retrieve the historic meter asset and read information for these Supply Points going as far back as the 1st May 2009. This data will be formatted and provided to the User as soon as reasonably practicable. And so on for the remainder of the period. There may be occasions during the year, e.g. the Annual Quantity review activities that occur at the end of September and start of October each year that mean the report may be delayed by a few days.

4 Relevant Objectives

Impact of the modification on the 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.	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

Achievement of relevant objective (d)(i) "Securing of effective competition between relevant Shippers"

Incoming shippers would have access to meter read history and meter asset information to enable a more thorough AQ review process than is currently the case. The current inequity would be removed, in that there would be a level playing field for incoming shippers relative to incumbent shippers such that all shippers have access to relevant information on which to base their customers AQ and this information would be available throughout the year (rather than limited to a single annual report). AQs are used for calculating transportation charges and as a fundamental component of energy allocation. More accurate AQs will lead to a more accurate allocation of transportation charges. This in turn will increase certainty in the market and may improve conditions for market entry and improve competition.

By allowing Shippers to access this data throughout the year, rather than solely via an annual report, will give them greater ability to carry out UNC processes which require accurate meter read and asset data with the most accurate data and therefore lead to a more timely correction of errors in asset data. This in turn will increase certainty in the market and may improve conditions for market entry and improve competition.

5 Impacts and Costs

Consideration of Wider Industry Impacts

There are no impacts to wider industry development.

Costs

Indicative industry costs – User Pays
Classification of the modification as User Pays or not and justification for classification
This is not a User Pays modification. Non-Code User Pays services will be created if implemented, however this is outside of the UNC process.
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.
Proposed charge for inclusion in ACS – to be completed upon receipt of cost estimate from Xoserve
Not applicable.

Impacts

Impact on Transporters' Systems and Process	
Transporters' System/Process	Potential impact
UK Link	<ul style="list-style-type: none"> None
Operational Processes	<ul style="list-style-type: none"> None
User Pays implications	<ul style="list-style-type: none"> None

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	<ul style="list-style-type: none"> None
Development, capital and operating costs	<ul style="list-style-type: none"> None
Contractual risks	<ul style="list-style-type: none"> Potentially minimises these risks by providing more accurate and timely provision of data
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> None

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
Section V	• Amendment to permit the release of data
Section G	• Amendment to remove the Annual service

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
Measurement Error Notification Guidelines (TPD V12)	• None
Energy Balancing Credit Rules (TPD X2.1)	• None

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Impact on UNC Related Documents and Other Referenced Documents

Uniform Network Code Standards of Service (Various)	<ul style="list-style-type: none">• None
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Impact on Core Industry Documents and other documents

Document	Potential impact
Safety Case or other document under Gas Safety (Management) Regulations	<ul style="list-style-type: none">• None
Gas Transporter Licence	<ul style="list-style-type: none">• None

Other Impacts

Item impacted	Potential impact
Security of Supply	<ul style="list-style-type: none">• None
Operation of the Total System	<ul style="list-style-type: none">• None
Industry fragmentation	<ul style="list-style-type: none">• None
Terminal operators, consumers, connected system operators, suppliers, producers and other non code parties	<ul style="list-style-type: none">• None

6 Implementation

As self-governance procedures are proposed, implementation could be 16 business days after a Modification Panel decision to implement.

7 The Case for Change

There are no further additions to the case for change outlined above.

8 Legal Text

Text

Wales & West Utilities has prepared the following Text at the request of the Modification Panel. A supporting commentary has also been provided (this does not form part of the legal text).

ADD THE FOLLOWING PARAGRAPHS

TPD SECTION V - GENERAL

NEW PARAGRAPH V 5.15

V5.15 Disclosure of Historic Supply Meter Point Asset and Read information (Annex V-8)

V 5.15.1 Where in respect of any Supply Point, the Transporter is requested by the Registered User to disclose such historic Supply Meter Point Asset and Read data (the information detailed in Annex V-8 "**Historic Supply Meter Point Asset and Read information**") then the Registered User of such Supply Points agree that any such request will be regarded as made on behalf of such Registered User and accordingly the Transporter is authorised to disclose such Information in accordance with such request.

V5.15.2 Upon a request by any Registered User, the Transporter shall as soon as reasonably practicable provide the Registered User with the details specified in paragraph Annex V-8 in respect of each Supply Point (other than an NTS Supply Point) for which the User is the Registered User (relevant Supply Point) at the date on which the Transporter is in receipt of the User's Request.

V 5.15.3 For the purposes of paragraph V5.15.1 and V5.15.2 the period of data provision is three (3) years historical data.

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ANNEX V-8

Historic Supply Meter Point Asset and Read information

The Transporter will provide to the Registered User, in respect of any Supply Meter at a Supply Meter Point comprised in a relevant Supply Point during the relevant period, the following details:

(a) each Meter Reading held by the Transporter and the date of the Meter Reading, including:

(i) in respect of each meter or convertor exchange at the Supply Meter Point during the relevant period, the date of the meter or convertor exchange, the closing meter reading for the old Supply Meter and the first meter reading for the new Supply Meter or convertor;

(ii) in respect of each Supply Point Registration in relation to the Supply Meter Point during the relevant period, the Opening Meter Reading provided to the Transporter (pursuant to TPD Section M3.8.2) or estimated Reading (determined pursuant to TPD Section M3.8.5) and any Meter Readings provided to the Transporter under TPD Section M3.3 and the date of such Meter Reading;

(iii) in respect of Opening Meter Readings, where installed, the converted and unconverted reading of the convertor;

(iv) whether the Meter Reading triggered a User Suppressed Reconciliation Value or a Suppressed Reconciliation Value; and

(b) in relation to the Supply Meter:

(i) the model name;

(ii) meter serial number, dials and digits;

(iii) metric/imperial indicator;

(iv) the convertor number of dials;

(v) the applicable conversion factor; and

(vi) the meter/convertor round the clock count.

DELETE THE FOLLOWING PARAGRAPHS

TPD SECTION G - SUPPLY POINTS

~~G1.6.21 Upon a request by any User received no later than 1 April in the preceding Gas Year, the Transporter shall as soon as reasonably practicable after commencement of the following User AQ Review Period but not later than one month before the end of the User AQ Review Period provide the User with the details specified in paragraph~~

~~1.6.22 in respect of each Supply Point (other than an NTS Supply Point) for which the User is the Registered User ("relevant" Supply~~

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Point) at the date on which the Transporter is in receipt of the User's request ("**relevant date**").

~~1.6.23~~ For the purposes of paragraph ~~1.6.23~~ the "**relevant period**" is the period of three (3) years ending on the relevant date. ~~1.6.23~~ Without prejudice to paragraph ~~1.6.24~~, the Transporter will provide to the User, in respect of any Supply Meter at a Supply Meter Point comprised in a relevant Supply Point during the relevant period, the following details:

(a) each Meter Reading held by the Transporter and the date of the Meter Reading, including:

(i) in respect of each meter or convertor exchange at the Supply Meter Point during the relevant period, the date of the meter or convertor exchange, the closing meter reading for the old Supply Meter and the first meter reading for the new Supply Meter or convertor;

(ii) in respect of each Supply Point Registration in relation to the Supply Meter Point during the relevant period, the Opening Meter Reading provided to the Transporter (pursuant to TPD Section M3.8.2) or estimated Reading (determined pursuant to TPD Section M3.8.5) and any Meter Readings provided to the Transporter under TPD Section M3.3 and the date of such Meter Reading;

(iii) in respect of Opening Meter Readings, where installed, the converted and unconverted reading of the convertor;

(iv) whether the Meter Reading triggered a User Suppressed Reconciliation Value or a Suppressed Reconciliation Value; and

(b) in relation to the Supply Meter:

(i) the model name;

(ii) meter serial number, dials and digits;

(iii) metric/imperial indicator;

(iv) the convertor number of dials;

(v) the applicable conversion factor; and

(vi) the meter/convertor round the clock count.

~~1.6.24~~ The Transporter shall only be required to provide details in relation to a relevant Supply Point to the extent such details have not been provided to the User in response to an earlier request from the User under paragraph ~~1.6.21~~.

~~1.6.25~~ Provision of the details in accordance with paragraph ~~1.6.23~~ will be performed as a User Pays Service and the User shall pay (in accordance with Section S) a User Pays Charge to the Transporter.

Commentary supporting rationale for legal text (this does not form part of the legal text)

There are two key component parts to the solution of this modification, which are both reflected in the legal text:

- 1) Amendment to UNC TPD Section V to create the necessary permissions for the historic data to be provided to the current Registered User; and
- 2) An amendment to TPD section G1.6.21 – G1.6.25 to remove the annual service from the UNC.

In addition, and outside of the UNC, two Non-Code User Pays services are to be created, an annual monthly service (12 reports per year) for the forthcoming year, and an annual quarterly service (4 reports per year) for the forthcoming year. On implementation of this modification the two Non-Code services will be added to the Services Schedule for the Provision of Non-Code User Pays Services and included in the Agency Charging Statement (in conjunction with any necessary discussions with the User Pays User Committee).

The use of Annex V-8 in Section V of the UNC TPD reflects the fact that Modification 0399 will be adding Annexes V-6 and V-7 to UNC TPDV on 01 September 2012.

9 Recommendation

All parties are invited to consider whether they wish to submit views regarding this self-governance modification. The close-out date for responses is 07 September 2012, which should be sent to enquiries@gasgovernance.co.uk. A response template which you may wish to use is at www.gasgovernance.co.uk/0416



Consultation Ends

On 07 September 2012

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