

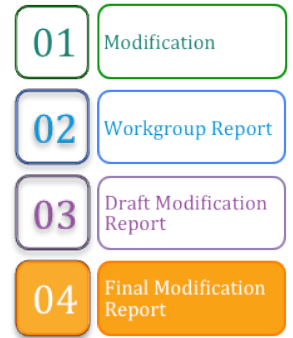
## Stage 04: Final Modification Report

# 0422:

## Creating the permission to release data to Meter Asset Provider organisations

This modification seeks to create the permissions for supply point data to be provided to Meter Asset Provider (MAP) organisations. An enquiring MAP would submit a portfolio of meter point reference numbers against which data can be provided.

At what stage is this document in the process?



Panel recommended implementation



High Impact: None



Medium Impact: None



Low Impact: Shippers and Transporters

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## About this document:

This Final Modification Report will be presented to the Panel on 21 February 2013.

The Authority will consider the Panel's Recommendation and decide whether or not this change should be made.



3 **Any questions?**


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# 1 Summary

## Is this a Self-Governance Modification?

The Modification Panel determined that this modification should not follow Self-Governance procedures.

## Why Change?

Currently the UNC only permits the release of certain data to certain parties. MAPs are not currently permitted access to any of the Sites and Meters supply point data. Implementation of this modification would provide for the release of data to an enquiring MAP.

## Solution

The solution is an amendment to UNC TPD Section V5 (Protected Information) to permit the release of the data in question to an enquiring MAP. The enquiring MAP must submit the MPRN for the data request.

The MAP organisations are held on SPAA market domain data

<http://www.spaa.co.uk/documents/mdd/current-version>

Only MAP organisations held within the SPAA records will be permitted to request the information.

## Impacts and Costs

There are no costs associated with this modification as it seeks to permit the release of data. Any delivery costs would be borne by the MAP organisations.

## Implementation

No timetable for implementation is proposed.

## The Case for Change

MAPs have advised that the data flows between the relevant parties (suppliers and MAMs to MAPs) are not occurring to the extent required by MAPs to operate their businesses. MAPs have suggested that they may need to shorten the lifetime asset recovery timescale and increase charges to cover this shorter period due to losses as a result of either lost assets or unknown suppliers. The MAPs are keen to address this issue now before more expensive smart meters are rolled out.

## 2 Why Change?

MAPs have advised that the data flows between the relevant parties (suppliers and MAMs to MAPs) are not occurring to the extent required by MAPs to operate their businesses efficiently. MAPs have suggested that they may need to shorten the lifetime asset recovery timescale and increase charges to cover this shorter period due to losses as a result of either lost assets or unknown suppliers. Improved efficiency of meter provision arrangements should lead to lower overall metering costs for trading parties. The MAPs are keen to address this issue now before more expensive smart meters are rolled out.

## 3 Solution

TPD Section V of the UNC is amended to explicitly permit the release of the following data (the information) to a Meter Asset Provider (MAP) organisation.

- Asset data
  - o Meter Serial Number
  - o Meter Model
  - o MAM id
  - o Meter installation date
  - o Meter removal date
- Supply meter point data
  - o Meter point status
  - o GT id
- Supply data
  - o Supplier id and full name
  - o Confirmation effective date

The information is requested where the MAP has been unable to obtain data from industry data flows between Suppliers, Meter Asset Managers and MAPs.

The relevant section of the UNC is amended to define the Meter Asset Provider (MAP).

In order to obtain the relevant information from the Transporter, the MAP will supply the MPRN in question along with the associated Meter Serial Number and Meter Model to the Transporter. This data will be validated against records held on UK Link systems, and the information shall only be provided where the MPRN, serial number and meter model match the records held on UK Link systems.

TPD Section V of the UNC is amended to require a MAP to enter into a confidentiality agreement with the Transporters on terms no less onerous than those of TPD Section V5, but including clauses detailing the data and permitted purpose, and clauses to include enforcement of the confidentiality agreement by a User under the Contracts (Rights of Third Parties) Act 1999.

The Information is:

### Asset data

Meter Serial Number  
Meter Model  
MAM id  
Meter installation date  
Meter removal date

### Supply meter point data

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Meter point status  
GT id

Supply data  
Supplier id and full name  
Confirmation effective date

In addition, where the MPRN, meter serial number and meter model (as provided by the MAP) do not match the records held on UK Link systems, a response shall be provided to indicate this. For the avoidance of doubt none of the information will be provided.

To enable UNC parties to see the purpose behind this modification and supporting processes the following information has been included but does not form part of the modification or legal text.

Following this modification to the UNC, it will then be the case that a MAP can enter into the confidentiality agreement with the Transporters to obtain access rights to the data, and a contract with Xoserve for the provision of the service. Only MAP organisations registered on the SPAA records will be permitted to request the information.

One of the conditions of the MAP: Xoserve contract will be for the MAP to provide their complete portfolio of meters as may change from time to time. When the MAP submits MPRN information to Xoserve (as the Gas Transporters service provider) to request the information, in addition to relevant control checks e.g. the existence of a signed confidentiality agreement, Xoserve will validate the submitted MPRNs against the MAP portfolio. Only where the MPRNs are on the MAP portfolio and the MPRN, meter serial number and meter model match the records held on the UK Link system, will the MAP be provided with the relevant information as held on the UK Link systems. It is anticipated that both the terms of the confidentiality agreement and the terms of the contract with Xoserve will be in the public domain.

## 4 Relevant Objectives

Impact of the modification on the <b>Relevant Objectives:</b>	
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.	Potential impact
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

### d) Securing of effective competition

Some parties felt that this change may improve competition between Shippers/Suppliers by the provision of timely data to the MAP organisation as it may reduce, in some circumstances, unknown or potentially misallocated costs being incurred by Suppliers. Improved efficiency of meter provision arrangements should lead to lower overall metering costs. Whilst not directly benefitting UNC parties, this modification may improve the efficiency of the operation of the wider gas industry, thereby reducing industry costs and improving services to consumers.

British Gas does not consider this change directly impacts the UNC. However, the benefit is to the industry of more accurate charging for meter provision arrangements leading to lower metering charges overall.

SSE considers that additional costs will be added into the process and that these will fall on suppliers ultimately and that some risk will be placed on shippers. They feel that MAPs may be able to secure some revenue but only for the period of tenure of the current supplier and not retrospectively. Therefore, SSE considers this will have a negative impact on the relevant objectives.

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## 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 as it has no impact on central systems and MAPs would fund any changes.
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"> <li>None</li> </ul>
Operational Processes	<ul style="list-style-type: none"> <li>None</li> </ul>
User Pays implications	<ul style="list-style-type: none"> <li>None</li> </ul>

Impact on Users	
Area of Users' business	Potential impact

Impact on Users	
Administrative and operational	<ul style="list-style-type: none"> <li>SSE have some evidence that where the MAP has the identity of the supplier, MAPs will invoice suppliers directly. To pay these invoices and depending on the volumes of invoices received, SSE would have to build systems to support the process to validate the MAP invoices and identify the MAMs from whom credits will be required. Asset charges will have been incorporated within the MAM charges. The cost of this should not be underestimated.</li> </ul>
Development, capital and operating costs	<ul style="list-style-type: none"> <li>None</li> </ul>
Contractual risks	<ul style="list-style-type: none"> <li>None</li> </ul>
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> <li>A number of Workgroup participants were concerned that the agreements between Xoserve and MAPs may place obligations on them they are unable to mitigate. This is due to the MAP request being made on behalf of the User and without the User's knowledge.</li> <li>There is a risk that Users may be unduly impacted should information provided under these provisions be misused. However, this risk should be mitigated by the inclusion of protection from the misuse of information within the contract terms between Xoserve and MAPS.</li> </ul>



## 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
Defined terms	• Definition of MAP organisation

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

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Impact on UNC Related Documents and Other Referenced Documents	
ECQ Methodology (TPD V12)	• None
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	• This modification may improve the efficiency of operation of MAP and supplier organisations. These efficiency gains should lead to improvements in customer service in the wider gas industry.

## 6 Implementation

No timetable for implementation is proposed.

## 7 The Case for Change

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

## 8 Legal Text

SSE is concerned that the legal text implies that the MAP is acting on behalf of the 'registered user'. MAPs and shippers have no association and while some provision to mitigate the risk to shippers is made for a breach of confidentiality, this does not cover all risk.

### UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT

#### SECTION V - GENERAL

##### 5 INFORMATION AND CONFIDENTIALITY

##### 5.16 Disclosure of MAP Information (Annex V-9)

- 5.16.1 For the purposes of this paragraph 5.16, “**Meter Asset Provider**” shall mean the provider of the Supply Meter, not having any responsibility for the maintenance of such Supply Meter; and “MAP” shall be construed accordingly.
- 5.16.2 For the purposes of this paragraph 5.16, “**Meter Point Request Information**” shall include the following information in respect of each Supply Meter Point:
- (a) meter point reference number;
  - (b) meter serial number; and
  - (c) meter model.
- 5.16.3 For the purposes of this paragraph 5.16, “**Meter Point Information**” shall mean the information as detailed in Annex V-9.
- 5.16.4 Subject to paragraphs 5.16.6 and 5.16.7 below, where a Transporter is requested by a MAP to provide information in respect of a given Supply Meter Point and provided the MAP notifies the Transporter of the Meter Point Request Information for each relevant Supply Meter Point comprised within such Supply Point, then, subject to paragraph 5.16.5, any such request shall be regarded as made on behalf of the Registered User and the Transporter shall be authorised by such Registered User to disclose the Meter Point Information to the MAP for each Supply Meter Point comprised in the Supply Point Registration for such Supply Point.
- 5.16.5 Meter Point Information shall only be provided in respect of a given Supply Meter Point where the Meter Point Request Information matches the records on the Supply Point Registration. Where the Meter Point Request Information fails to match the records on the Supply Point Registration the Transporter shall:
- (a) provide a response to the MAP indicating that the Meter Point Request Information supplied by the MAP has failed to match the records on the Supply Point Registration; and
  - (b) provide no further information in respect of this Supply Meter Point.
- 5.16.6 A Meter Asset Provider shall only be entitled to receive the information pursuant to paragraph 5.16.4 where it has not already received such information (or any part thereof) from data flows between suppliers, Meter Asset Managers and MAP.
- 5.16.7 The MAP and the Transporter shall enter into a confidentiality agreement (on terms no less onerous than those of this paragraph 5) for the purposes of receiving the information pursuant to paragraph 5.16.4. Such confidentiality agreement shall detail the permitted purpose for such information and shall include an expressed benefit on Registered Users and each Registered User shall be entitled to enforce the agreement (pursuant to the Contract (Rights of Third Parties) Act 1999) as if it were the Transporter.

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## DEFINED TERMS

<b>Defined Terms to be inserted into the Code as a result of Modification 0422</b>	
“Meter Asset Provider”	Section V5.16.1
“Meter Point Request Information”	Section V5.16.2
“Meter Point Information”	Section V5.16.3

### Annex V-9

**Table of Supply Meter and Supply Meter Point data fields available (subject to verification and Section V5.16) to the Meter Asset Provider upon request.**

<b>Data Field Name</b>
meter point reference number*
meter serial number*
meter model*
MAM id
meter installation date
meter removal date
meter point status
gas transporter identification
supplier identification and full name
confirmation effective date

\* - fields to be provided by the requesting Meter Asset Provider at the time of request.

## 9 Consultation Responses

Representations were received from the following parties:

Company/Organisation Name	Support Implementation or not?
British Gas	Support
Community of Meter Asset Providers (CMAP)	Support
E.ON UK	Support
National Grid Distribution	Support
RWE npower	Qualified Support
Scotia Gas Networks	Support
SSE	Not in Support

Of the seven representations received five supported implementation, one offered qualified support and one was not in support.

### Summary Comments

E.ON UK felt that, by ensuring parties have access to data that assists revenue collection and improves the query management process, this modification could result in lower charges.

CMAP concurred that access to data will enable Meter Asset Providers (MAPS) to efficiently resolve queries and that the modification will bring benefits to both the supplier and MAPs. They believed it would reduce, in some circumstances, potentially misallocated costs being incurred by Suppliers; improve efficiency of meter provision arrangements and lead to lower metering costs.

CMAP also highlighted that the arrangements should improve wider gas industry efficiencies, thereby reducing industry cost and improving services to consumers. They anticipate possible minor cost to support the data requests however this would be offset by the savings made in improved administration.

National Grid Distribution agrees implementation of this modification would provide for the release of relevant Supply Point data to an enquiring Meter Asset Provider (MAP). MAPs have advised that the data flows between the relevant parties (suppliers and MAMs to MAPs) are not occurring to the extent required by MAPs to operate their businesses.

RWE npower supports the intent of the modification. This modification will assist MAPs with the means to track their assets and assist in the process of data quality issues. They welcome improved efficiency of meter provision arrangements that should lead to lower metering costs. This in turn would help to reduce industry costs and hopefully improve services to consumers.

RWE npower anticipates that any DPA issues are fully resolved before data is released by Xoserve and would like re-assurance that the agreements between Xoserve and MAPs are transparent.

SSE is concerned that additional costs are being introduced into the Industry because Suppliers are not following RGMA processes and/or not ensuring that service providers (Suppliers' MAMs) perform appropriately under their contracts. It is not clear why this solution, at additional cost, has been determined to be the remedy to the problem of MAPs not receiving revenue for their assets, rather than ensuring that participants perform appropriately within the current governance.

## Additional Issues Identified in Responses

E.ON UK noted concern was expressed in the development of this modification that it could lead to Suppliers being asked for payment of rental invoices directly rather than via the contracted MAM. EON feels that, once the MAP has confirmation of the MAM ID, it will enable them to progress the appropriate commercial discussions directly with the MAM as it is clearly in the MAP's interest to facilitate the continuity of the contractual arrangements with the suppliers' MAMs and it should lead to less query management between Suppliers and MAPs.

Although RWE npower supports this modification, recognition should be given to the work carried out at the SPAA where relationships have been created through RGMA to allow a relationship between MAMs and MAPs. SPAA changes CP 12/210 (Mandate sending of MKPRT record containing the supplier in an ONUPD INSTL flow from MAM to MAP) and CP 12/211 (Mandate sending of MKPRT record containing the supplier in ONUPD APPNT flow from MAM to MAP) were implemented to assist MAPs. If this relationship were to work then the correct way of obtaining this data would be for the Map to approach the MAM. An enduring solution would be an adherence by the Suppliers/ MAMs to existing industry obligations.

SSE considers the existing processes for moving meter information, and information associated with it, is through the RGMA flows governed under the SPAA. Recent changes have been implemented in the SPAA to remedy the issue of data not being provided or updated to address the issue of MAPs not receiving revenue for their meters. However the elapsed time between the SPAA modifications and this modification is not sufficient to determine whether these changes have made a material difference.

SSE is concerned that through suppliers' poor performance in adhering to RGMA processes and managing their MAMs to do similarly, costs are being shifted on to other participants when sites are acquired through the change of supplier process. This is having the effect of distorting competition. This modification will not stop this, but will add additional costs in order to ensure that MAPs obtain their revenue. SSE would prefer a solution that focuses on the poor performance, so that costs remain with the appropriate party.

SSE accepts that measures should be in place to try to ensure that relevant MAPs have a right to the information they are requesting, but are concerned that the legal drafting indicates that the MAP will be acting in the 'Users' name. As a Shipper with no immediate relationship with MAPs this solution cannot be supported legally. There is no governance over MAPs and if a MAP behaves inappropriately (confidentiality aside), the Shipper will have no route for redress with that party.

SSE is concerned that the modification will enable MAPs to gain access to the current Supplier's name and the current MAM's name. It has not been made clear how the MAPs plan to use this information. If the MAP chooses to contact the Supplier this will place an additional administrative burden to respond on Suppliers. Suppliers are required to make arrangements with a MAM for their meters. The defined gas industry processes do not allow for or expect MAPs to make direct contact with the Supplier. If participants wish to change this then SSE would prefer that the industry governance is amended appropriately to efficiently develop and amend processes.

## 10 Panel Discussions

The Panel Chair summarised that this is a facilitating modification that seeks to give permission, subject to conditions, for a limited range of data to be passed to Meter Asset Providers. The modification will not cause any information to flow, but will enable other contractual arrangements to be made such that data can be released.

Members accepted that benefits could arise from information being passed to MAPs, enabling more efficient business operation. This could help to reduce costs across the industry and so be beneficial to competition. They also recognised that risks from data release had been identified in consultation responses, but Members felt any increase in queries would be temporary and offset by a longer term benefit through improved data quality.

By facilitating the release of data that would not otherwise be permitted, Members therefore concluded that implementation of the modification would be consistent with facilitating the achievement of effective competition between Suppliers because it would help to ensure that MAP charges are allocated to the appropriate Supplier, thereby supporting accurate cost allocations.

Members then voted and determined unanimously to recommend that Modification 0422 be implemented.

## 11 Recommendation

### Panel Recommendation

Having considered Modification Report, the Panel recommends that Modification 0422 should be made.