

Stage 03: Draft Modification Report

0437S:

Retention of MAM Id in Transporter Systems at Change of Shipper

At what stage is this document in the process?



At Change of Shipper, Transporters delete the previous Meter Asset Manager (MAM) information, requiring the incoming Supplier through their Shipper to provide updated Meter Asset Manager information. This UNC Modification seeks agree the methodology for applying User Pays charges to enable a change to Transporter systems (i.e. Class 3 UK Link Modification), to retain the MAM Id at a Change of Shipper event.



Responses invited by 05 April 2013.



High Impact:



Medium Impact:



Low Impact:

Transporters

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Version 1.0

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About this document:

This Draft Modification Report is issued for consultation responses, at the request of the Panel on 21 February 2013. All parties are invited to consider whether they wish to submit views regarding this self-governance modification.

The close-out date for responses is 05 April 2013, which should be sent to enquiries@gasgovernance.co.uk. A response template, which you may wish to use, is at www.gasgovernance.co.uk/0437.

The Panel will consider the responses and agree whether or not this self-governance modification should be made.



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?

At Change of Shipper, Transporters delete the previous Meter Asset Manager (MAM) information, requiring the incoming Supplier through their Shipper to provide updated Meter Asset Manager information. A change has been agreed by the SPAA Expert Group to modify Transporter systems to stop the deletion of the MAM ID. However, User Pays charges apply where a change is required to Transporter systems (i.e. Class 3 UK Link Modification) and this UNC modification has been raised to identify how these User Pays charges are allocated.

Solution

This Modification is required by UNC section U 8.5.2, which states that any Class 3 Modification (i.e. change to Transporter systems paid for by Users) a Modification Proposal must be made in accordance with the Modification Rules.

This modification identifies how the User pays Charges will be apportioned.

Relevant Objectives

This modification will facilitate a change, which will aid a licensee in meeting their licence obligations to populate a MAM ID and minimise exceptions. In addition, it facilitates the allocation of User Pays charges required by a Class 3 UK Link Modification and therefore furthers (c), Efficient Discharge of Supplier Licence.

This is considered to have a positive effect on securing effective competition. By amending Transporter systems to stop deletion of the data this will reduce the impact to incoming Suppliers where previous Suppliers / Shippers have failed to fulfil their obligations to provide MAM information. Suppliers through Shippers will retain the responsibility to provide MAM identity.

Xoserve has provided the SPAA Expert group with a requirement definition and a rough order of magnitude (ROM) to assist the group in its discussion and will present this information at the relevant work group.

Implementation

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

No implementation timescales are proposed. However, it is expected that implementation timescales will be circa 26 weeks from an approved modification decision.

2 Why Change?

Currently at a Change of Shipper for given meter point, the Transporters notify the incoming Shipper of the MAM Id. Transporters then delete this data, and the new Shipper should provide details of the relevant MAM, once appointed. Where a Shipper fails to do so, the Transporter is unable to provide any MAM information to subsequent Shippers at the next supply point transfer.

This presents a risk to subsequent Suppliers by not knowing the incumbent MAM when they take over a site this hinders the ability to contact and subsequently contract with that MAM for provision of Metering Services.

Currently Transporters provide anonymised count of meter points by Shipper to SPAA, which through it's SPAA Expert Group monitors the population of blank MAM Identities. A number of exercises have been conducted by some Shippers to populate blank MAM information. Despite these exercises, a significant population of blank MAM Ids exist (circa 300-350k) where the current Shipper has failed to notify the Transporters of the MAM Identity.

Shippers will retain the responsibility to update the MAM Identity – even where this is not changed from existing data held in Transporter systems. The existing Supplier licence and SPAA obligations to provide this information are not changed by the modification.

A change has been agreed by the SPAA Expert Group to modify Transporter systems to stop the deletion of the MAM ID. However, User Pays charges apply where a change is required to Transporter systems (i.e. Class 3 UK Link Modification) and this UNC modification has been raised to identify how these User Pays charges are allocated.

It is further proposed through this modification that the SPAA Expert Group shall monitor the population of meter points where the MAM Identity is populated, but that the current Shipper has failed to notify the Transporter of the MAM Identity.

In addition to that identified the above, the Proposer has identified the following advantages:

The solution does not require Shipper and Supplier system changes.

Any information maintained by Transporters will be retained so that Shippers and Suppliers are provided with last known MAM data provided by Shippers to Transporters.

The solution seeks to reduce instances where blank MAM Ids are provided, therefore reduce Supplier exceptions. The solution also seeks to provide Suppliers relevant MAM information which allows them to initiate relevant investigation.

The proposed solution assists MAPs in identifying the relevant MAM in order to recover meter rental charges.

The SPAA Expert Group previously recognised that the as part of the proposed solution the retention of data may affect the confidence of the data held by Transporters in respect of the MAMs. i.e. data held currently by Transporters has been provided by the existing Shipper. This is now addressed by additional reporting to SPAA to identify a summary of such meter points by Shipper Short Code.

An additional User Pays report shall be developed to enable Users to identify detailed meter point information in order to address any occurrences within their portfolio.

3 Solution

Impact to Uniform Network Code

This change is proposed as a Class 3 UK Link Modification, as defined in Section U 8.4.2 (a) of UNC i.e.: Transporter System Modification where the Transporters do not intend to make such modification unless the costs of making the modification are to be recovered from UK Link Users.

Changes to the Uniform Network Code are not anticipated.

This Modification is required by UNC section U 8.5.2 which states that:

Before a Class 3 Modification may be made by the Transporters, a Modification

Proposal in respect thereof must be made in accordance with the Modification Rules and the Transporters or any User shall be entitled to make such a Modification Proposal.

An additional service line is expected in the User Pays Agency Charging Statement to enable Users to request the population of meter points where the MAM Identity is populated, but that the current Shipper has failed to notify the Transporter of the MAM Identity.

This modification proposes to allocate User Pays charges for the above amendments to UK Link Systems as follows:

User Pays
Classification of the modification as User Pays, or not, and the justification for such classification
This is a User Pays Modification.
Identification of Users, proposed split of the recovery between Gas Transporters and Users for User Pays costs and justification
100% Users.
Proposed charge(s) for application of Users Pays charges to Shippers
Proposed share of costs by meter point portfolio share excluding DM and Unique Sites as at Modification implementation date.
Proposed charge for inclusion in ACS – to be completed upon receipt of cost estimate from Xoserve
A Rough Order of Magnitude has been provided by Xoserve – indicating a cost in the order of £68k–£96k.

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.	Positive
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.	None
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

This modification will facilitate a change, which will aid a licensee in meeting their licence obligations to populate a MAM ID and minimise exceptions. In addition, it facilitates the allocation of User Pays charges required by a Class 3 UK Link Modification and therefore furthers (c), Efficient Discharge of Supplier Licence.

5 Implementation

As self-governance procedures are proposed, implementation could be 16 business days after a Modification Panel decision to implement. However, it should be noted that estimated implementation timescales will be 26 weeks from the point that this change is scheduled by Transporters within their Change Programme.

Expected Transporter implementation costs are detailed in Section 3 above. The modification explicitly proposes that Supplier / Shipper processes are unchanged – i.e. Suppliers retain the obligation to provide the MAM Identity.

This modification requires changes to Transporter systems, but no changes are expected to the UK Link Manual.

No explicit implementation date is proposed for this modification.

6 Legal Text

Text

No amendment to UNC text is expected.

7 Recommendation

The Panel have recommended that this report is issued to consultation and all parties should consider whether they wish to submit views regarding this self-governance modification.