

## Stage 01: Modification

# 0475:

## Update to Section G, Annex G3 (Prospective Erroneous Large AQ Calculation Proforma)

At what stage is this document in the process?

- 01 Modification
- 02 Workgroup Report
- 03 Draft Modification Report
- 04 Final Modification Report

Mod 392 was implemented in June 2012 to align with the implementation of iGT040. When Mod 392 was raised it omitted to specify that a change to the AQ values held within Annex G-3 should be also be made in order to maintain alignment with the CSEP NExA AQ values. This Modification serves to correct this situation.



The Proposer recommends that this modification should be:

- subject to self-governance



High Impact:



Medium Impact:



Low Impact:

0475

Modification

06 January 2014

Version 2.0

Page 1 of 7

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## Contents

1	Summary	3
2	Why Change?	4
3	Solution	5
4	Relevant Objectives	6
5	Implementation	7
6	Legal Text	7
7	Recommendation	7

## About this document:

This modification will be presented by the proposer to the panel on 16 January 2014.

The panel will consider the proposer's recommendation, and agree whether this modification should be subject to self-governance; and whether it should be issued for consultation or be referred to a workgroup for assessment.



Any questions?

Contact:  
Code Administrator



[enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)



0121 288 2107

Proposer:  
Marie Clark



[marie.clark@scottishpower.com](mailto:marie.clark@scottishpower.com)



0141 568 3284

Licence Holder:  
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Xoserve



[commercial.enquiries@xoserve.com](mailto:commercial.enquiries@xoserve.com)

0475

Modification

06 January 2014

Version 2.0

Page 2 of 7

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# 1 Summary

## Is this a Self-Governance Modification?

The Proposer requests that this Modification is progressed via ~~considered~~ the Self-Governance route. This Modification seeks only to change the AQ Values currently contained within Section G, Annex G-3 with those implemented within Mod 392 for typical domestic consumptions by house type. When Mod 392 was raised it omitted to include the requirement to update Annex G-3. A previous Modification which served to update the AQ Values included within the iGT CSEP NExA (Mod 328) outlined this requirement. The UNC appeals process, as outlined within UNC Section G 1.6.13(c)©(i) permits a Shipper to raise an appeal to an erroneously high domestic AQ (>293,000kWh) within 23 Business Days of a successful registration. Following a successful appeal and re-confirmation of the Supply Point, the revised AQ value is applied prospectively and therefore has no impact on historic energy or cost allocations.

The use of the BTU Form and in particular the assignment of an AQ value from Annex G-3 represents an estimate only of the domestic customer's consumption. A Shipper can utilise this approach to appeal a domestic AQ in the absence of any specific information relating to the gas ratings of appliances at a customer's property. When this solution was introduced within the UNC it was deemed that in the absence of any published consumption information relating to **occupied** properties by house type and geographical area that the **new build** values held LDZ CSEP NExA should be used. Use of this solution would ensure that Shippers incurred gas and transportation charges which were more reflective of a domestic customer's usage rather than the higher charges applied via application of an erroneously high AQ.

## Why Change?

Mod 392 was implemented in June 2012 to align with the implementation of iGT040. UNC Section G, Annex G-3 (Prospective Erroneous Large AQ Performa) replicates the AQ values held within the LDZ CSEP NExA Annex AQ values. These AQ values can be used where a Shipper identifies that a domestic customer has an erroneously high AQ >293,000kWh (10,000 Therms) on change of supplier. When Mod 392 was raised it omitted to specify that a change to the AQ values held within Annex G-3, showing typical domestic consumptions by house type, should be also be made in order to maintain alignment with the LDZ CSEP NExA AQ values. This Modification serves to correct this situation.

## Solution

Update UNC Section G, Annex G-3 with the revised AQ values included within Mod 392 and as outlined below:

Band	House Type	South SW, NT, WS, SO		Average WN, SE, NW, EA, EM, WM, NE		North NO, SC	
		AQ (kWh)	Number	AQ (kWh)	Number	AQ (kWh)	Number
A	1 Bed	6,473	12,167	7,022	14,210	7,718	3,167
B	2BF, 2BT	7,989	54,965	8,383	82,049	8,684	32,705
C	2BS, 2BD, 3BT, 3BF	10,776	37,236	11,304	76,964	11,372	17,821
D	3BS, 2BB	11,748	39,182	12,221	93,752	12,596	21,069
E	3BD, 3BB	13,429	20,549	14,468	51,950	16,276	24,883
F	4BD, 4BT, 4BS, 4BB	16,256	60,393	17,655	158,584	19,296	53,089
G	5BD, 5BS, 6BD	22,644	8,799	24,423	23,175	25,606	6,169

For the avoidance of doubt, it is not proposed at this time that a formal review of the AQ values contained within the above table is undertaken to determine if they remain reflective of new build AQ values. A periodic review of these AQ values is undertaken

0475  
Modification

06 January 2014

Version 2.0

Page 3 of 7

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via the iGT Shipper Group in accordance with the procedure implemented within iGT UNC Mod 051.

## Relevant Objectives

(d) Securing of effective competition between Shippers

Updating the AQ values held within Section G, Annex G-3 will allow a Shipper who wishes, on completion of a successful registration, to appeal the AQ value of a domestic customer with an erroneously high AQ (i.e.>293,000kWh) to a value which is more representative with the estimated consumption of a customer who resides within a similar house type in the same geographic area. A Shipper who utilises this domestic premise appeals mechanism has the opportunity to correct the potential application of excessive gas and transportation charges which would apply if an appeal was not raised. This in turn will ensure that charges are more proportionate with those expected to be applied to domestic customers with similar AQ usage. We therefore believe that this positively impacts this relevant objective.

f) Promotion of efficiency in the implementation and administration of the Code.

The use of the Self Governance route will allow the AQ Table within Annex G-3 to be updated in a more timely manner than would be the case if this Modification was to be progressed through the standard Modification process.

The timely update of Annex G-3 will ensure that alignment is maintained with the AQ Values outlined within the LDZ CSEP NExA Annex A.

## Implementation

As soon as possible. ~~following a positive direction.~~

## 2 Why Change?

Implementation of this Modification will ensure the continued alignment of AQ values held within Section G, Annex G-3 with those held within the LDZ iGT CSEP NExA Annex A AQ Table. The AQ values held in the LDZ CSEP NExA AQ Table are estimates of the average consumption of new build properties by house type and geographical area.

Failure to update Annex G-3 will result in Shippers, who wish to appeal an erroneously high AQ for a domestic site, assigning an AQ value which is proportionately higher than the AQ value currently used within the LDZ iGT CSEP NExA AQ Table.

The UNC Section G 1.6.13 (c)(i) requires a Shipper to raise an appeal to an erroneously high domestic AQ (>293,000kWh) within 23 Business Days of a successful registration.

0475

Modification

06 January 2014

Version 2.0

Page 4 of 7

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### 3 Solution

Update UNC Section G, Annex G-3 with the revised AQ values included within Mod 392 and as outlined below:

Band	House Type	South SW, NT, WS, SO		Average WN, SE, NW, EA, EM, WM, NE		North NO, SC	
		AQ (kWh)	Number	AQ (kWh)	Number	AQ (kWh)	Number
A	1 Bed	6,473	12,167	7,022	14,210	7,718	3,167
B	2BF, 2BT	7,989	54,965	8,383	82,049	8,684	32,705
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D	3BS, 2BB	11,748	39,182	12,221	93,752	12,596	21,069
E	3BD, 3BB	13,429	20,549	14,468	51,950	16,276	24,883
F	4BD, 4BT, 4BS, 4BB	16,256	60,393	17,655	158,584	19,296	53,089
G	5BD, 5BS, 6BD	22,644	8,799	24,423	23,175	25,606	6,169

For the avoidance of doubt, it is not proposed at this time that a formal review of the AQ values contained within the above table is undertaken to determine if they remain reflective of new build AQ values. A periodic review of these AQ values is undertaken via the iGT Shipper Group in accordance with the procedure implemented within iGT UNC Mod 051.

#### User Pays

Classification of the modification as User Pays, or not, and the justification for such classification.

*No User Pays service would be created or amended by implementation of this modification and it is not, therefore, classified as a User Pays Modification.*

Identification of Users of the service, the proposed split of the recovery between Gas Transporters and Users for User Pays costs and the justification for such view.

N/A

Proposed charge(s) for application of User Pays charges to Shippers.

N/A

Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.

N/A

## 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.	<del>None</del> Positive
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 between Shippers

Updating the AQ values held within Section G, Annex G-3 will allow a Shipper who wishes, on completion of a successful registration, to appeal the AQ value of a domestic customer with an erroneously high AQ (i.e.>293,000kWh) to a value which is more representative with the estimated consumption of a customer who resides within a similar house type and geographical area. A Shipper who utilises this domestic premise appeals mechanism has the opportunity to correct the potential application of excessive gas and transportation charges which would apply if an appeal was not raised. This in turn will ensure that charges are more proportionate with those expected to be applied to domestic customers with similar AQ usage. We therefore believe that this positively impacts this relevant objective.

### f) Promotion of efficiency in the implementation and administration of the Code.

The use of the Self Governance route will allow the AQ Table within Annex G-3 to be updated in a more timely manner than would be the case if this Modification was to be progressed through the standard Modification process.

The timely update of Annex G-3 will ensure that alignment is maintained with the AQ Values currently held within the LDZ CSEP NExA Annex A.

0475

Modification

06 January 2014

Version 2.0

Page 6 of 7

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## 5 Implementation

~~Whilst no specific implementation date is proposed, as this is restricted to an update of AQ Values within Annex G-3 only, implementation is requested as soon as possible.~~

As soon as possible.

## 6 Legal Text

Update to AQ Values held within Section G, Annex G-3 only.

## 7 Recommendation

The Proposer invites the Panel to:

- Determine that this modification should be subject to the self-governance process and issued directly for consultation. ~~and be issued directly for consultation.~~