

0516:

Information provision by large Customers to aid understanding of site characteristics

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

This modification proposes to create a clear process for large gas customers to provide information to the gas transporters for use in emergency plan and constraint management.



The Proposer recommends that this modification should be assessed by a Workgroup



High Impact:
Daily read Consumers, Gas Transporters.



Medium Impact:
Shippers.



Low Impact:
Non-daily read consumers, Transporters' Agent.

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About this document:

This modification was presented by the proposer to the UNC Panel on 16 October 2014.

The panel agreed with the proposer's recommendation, that the modification should be:

- referred to a workgroup for assessment.

Timetable:	
Initial consideration by Workgroup	23 October 2014
Amended Modification v4.0	14 January 2015
Amended Modification v5.0	21 January 2015
Workgroup Report presented to Panel	19 February 2015
Draft Modification Report issued for consultation	tbc
Consultation Close-out for representations	tbc
UNC Modification Panel decision	tbc



Any questions?

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1 Summary

Is this a Self-Governance Modification?

Self-Governance is not proposed as this modification may have a material impact on consumers.

Why Change?

It is important that the Distribution Network gas transporters have appropriate information regarding consumption patterns on their gas networks to help plan for local and national emergencies. This information is especially important for the largest individual site loads. At present there is no clearly defined or mandated mechanism for such individual site information to be provided to the transporters, and no process for storing or maintaining such information.

Solution

It is proposed that daily read customers (i.e. product 1 post Nexus) connected to a DN would be able to register their site needs in advance of potential emergency conditions (on a Site Characteristics Register established for the purpose). In the event of a local emergency the DN would be able to use this information and have regard for these site needs when handling the emergency, removing the need for further information provision during emergency conditions. For the avoidance of doubt simply having their site needs registered does not provide the customer any further protection or leeway from being curtailed and the transporters will continue to have complete discretion over how they handle an emergency. Furthermore, the creation of the register does not prevent individual customers from discussing its requirements in more detail with gas transporters as desired or prevent it from making its requirements known to the transporters in the event of an issue.

Relevant Objectives

This proposal provides greater certainty to the transporters that a customer will reduce its gas consumption in a timelier manner when required. The modification will therefore have positive impacts to relevant objectives a) & c).

Implementation

This modification has been optimized for post Nexus metering classes and is intended to be implemented at the same time as project Nexus.

Does this modification affect the Nexus delivery, if so, how?

This modification is not intended to have any impact on core systems; therefore it will not have an impact on Nexus delivery.

2 Why Change?

It is important that the DN gas transporters have as much information as possible regarding consumption patterns on their gas networks to help plan for local and national emergencies. This information is especially important for the largest individual site loads and for many such sites the lack of readily available information on their gas needs may hamper the speedy resolution of the emergency. At present there is no clearly defined mechanism for such individual site information to be provided to the transporters, and no process for storing or maintaining such information.

3 Solution

Class 1 sites connected to the distribution network, will be able to join a register with the purpose of notifying their transporter of their site's characteristic with regard to gas supply to notify the transporter what is required to facilitate efficient shut down of the site. It is our understanding that sites directly connected to the NTS have more frequent dialogue and so such a process is unnecessary and therefore the NTS is out of scope for this modification.

To enable this, the process would be triggered by the shipper on behalf of the customer submitting a formal request to the transporter to join the register. The shipper will be required to provide justification for this request as part of the submission. As part of the submission, the customer would have to provide detailed and independent information to support their submission. ***For the avoidance of doubt simply having their site characteristics registered does not provide the customer any further protection or leeway from being disconnected; the transporters will continue to have complete discretion over how they handle an emergency.***

The transporter will then be required to provide a response, acknowledging that they have received the information and asking for any clarifications they deemed acceptable.

As part of its consideration of the submission, the transporter may ask for any additional information it reasonably requires to support the submission.

Business Rules

1. A register (the Site Characteristics Register) will be established, detailing site specific system needs when a customer is directed to discontinue taking gas from the network during an emergency as defined under UNC TPD Section Q.
2. DN transporters shall be responsible for maintaining the Site Characteristics Register
3. Submissions to join the Site Characteristics Register will be submitted by shippers on behalf of their customers to the relevant transporter. Submission to join the register can be made at any time.
4. Submissions to join the register for the next gas year can be made up to 120 Calendar days in advance of the commencement of that gas year.

Example: Submissions made between 3 June (which is 120 calendar days before the end of the gas year) and 30 September will need to specify which gas year the submission relates to. So a submission made on 10 June 2015 will need to specify whether the submission relates to gas year 2014/2015 or 2015/2016.

*Submissions made between 1 October and 2 June will be registered in the gas year in which the submission is made. so, a submission made on 26 January 2015 cannot specify that it relates to the 2015/2016 gas year (which commences on 1 October 2015). It **must, for the purposes of BR5 f, state that it relates to the 2014/2015 Gas Year** which commenced on 1 October 2014.*

5. Each submission to join the Site Characteristics Register must set out:
 - a. Name of the customer
 - b. Applicable Meter Point Registration Number (MPRN)
 - c. End user emergency contact details to be used during an emergency with sufficient backup emergency contact details as defined under UNC TPD Section Q.
 - d. Preferred shutdown timescales and preferred gas needs during that shutdown process.

- e. Detailed and independent justification for the submission, including details on the likely damage (including cost) a site may incur or the hazards that may be caused if they are required to shut-down immediately.
 - f. The Gas Year (or part thereof) the submission is intended for.
6. Shippers may only apply for a single MPRN per submission.
7. No submission can be made unless:
 - a. It can demonstrate through independent analysis that it will suffer damage or cause a hazard specifying time and financial cost to replace equipment, along with an estimate of lost production.
 - b. It is a Class 1 site.
 - c. It is not connected to the NTS
8. If a site no longer meets the criteria set out in BR7, then they must immediately inform the transporter directly who will then update the Site Characteristics Register.
9. Once accepted onto the Site Characteristics Register, the transporter is not required to verify or update the information that have been provided to it.
10. Once submitted the submission may be amended if agreed to by the transporter. (this process can be initiated by either party and is intended to accommodate changes following any discussion). Any update will be treated as an acceptance onto the Site Characteristics Register in accordance with BR 14.
11. Transporters will respond no later than 90 calendar days after any submission received. Any response will contain the following information:
 - a. Name of the customer.
 - b. Applicable MPRN.
 - c. Whether the site's information has been placed onto the register.
 - d. Whether it require any further information.
 - e. The period the Supply Meter Point will be present on the register
12. As part of its consideration of the submission, the transporter may ask for any additional information it reasonably requires, the transporter may then have 14 calendar days from receipt of the additional information to accept or reject the submission.
13. Once accepted onto the Site Characteristics Register the customer details will be remain on the register until the end of the Gas Year to which the submission relates and as specified in the submission in accordance with BR 5 f and the Transporter's response in accordance with BR 11 e. For the site to remain the information will need to be resubmitted in accordance with BR 3 to be placed back onto the register.
14. During an emergency the transporter will have regard for the Site Characteristics Register, but will not be obliged to act on the information contained therein.
15. The transporter may share any or all of the information contained on the Site Characteristics Register with National Grid NTS.
16. Being on the register will not necessarily mean that a customer will be treated differently to any other customer not on the register during an emergency.

User Pays	
Classification of the modification as User Pays, or not, and the justification for such classification.	We do not believe that this service will impact on Xoserve systems as this is an agreement directly between the transported and the customer and therefore should not incur a user pays charge
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.	Not applicable
Proposed charge(s) for application of User Pays charges to Shippers.	Not applicable
Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.	Not applicable

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.	Positive
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

The proposals set out in this modification would further Relevant Objectives c) – as a clear process of prior notification to the transporter of a site's gas needs during an emergency will aid planning and management of network emergencies and allow parties put in place suitable communication processes.

5 Implementation

At the same time as Project Nexus.

6 Legal Text

To be provided by the Transporters when requested by the Modification Panel.

7 Recommendation

The Proposer invites the Panel to:

- Determine that this modification should not be subject to self-governance; and
- Should progress to a Workgroup for assessment.