















0584S:

Energy Theft Tip-Off Service (ETTOS) – Release of Supplier identity

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

To fulfil the terms of the ETTOS a UNC Modification is required to give the Transporter permission to release the Supplier identity, as provided by Users, of a supply point to the ETTOS Service Provider.

	Responses invited by 07 July 2016 .
	High Impact: N/A
	Medium Impact: N/A
	Low Impact: Shippers, Transporters

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About this document:		 aross@northerngas.co.uk																
<p>This Draft Modification Report is issued for consultation responses, at the request of the Panel on 16 June 2016. All parties are invited to consider whether they wish to submit views regarding this self-governance modification.</p> <p>The close-out date for responses is 07 July 2016, which should be sent to enquiries@gasgovernance.co.uk. A response template, which you may wish to use, is at: www.gasgovernance.co.uk/0584</p> <p>The Panel will consider the responses and agree whether or not this self-governance modification should be made.</p>		Systems Provider: Xoserve																
<p>The Proposer recommends the following timetable:</p> <table border="1"> <tbody> <tr> <td>Draft Modification Report issued for consultation</td> <td>16 June 2016</td> </tr> <tr> <td>Consultation Close-out for representations</td> <td>07 July 2016</td> </tr> <tr> <td>Final Modification Report presented to Panel</td> <td>21 July 2016</td> </tr> <tr> <td>UNC Modification Panel decision</td> <td>21 July 2016</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>		Draft Modification Report issued for consultation	16 June 2016	Consultation Close-out for representations	07 July 2016	Final Modification Report presented to Panel	21 July 2016	UNC Modification Panel decision	21 July 2016									 commercial.enquiries@xoserve.com
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		Additional contacts: Joanna Ferguson																
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		 0113 397 5365																

1 Summary

Is this a Self-Governance Modification?

The Panel determined this modification qualifies for self-governance as it will not have a material impact on parties to the UNC, consumers or competition and is simply allowing the release of data.

Is this a Fast Track Self-Governance Modification?

This is not a house-keeping modification and therefore does not qualify for Fast-Track status.

Why Change?

As part of the Theft Risk Assessment Service (TRAS) created and managed under the SPAA, Suppliers have agreed to create and fund an ETTOS to manage tip-offs related to theft of gas across the energy industry.

To deliver the ETTOS the Supplier identity to the supply point will be required for the ETTOS Provider to match tip-offs to the relevant Supplier. This service is being introduced into SPAA on CP15/325.

Solution

This modification proposes to provide the Transporter with the necessary permissions within the UNC to release the Supplier identity of the supply point to the ETTOS Service Provider on receipt of a tip-off. This will enable the ETTOS Service Provider to provide the relevant Supplier with the tip-off information.

Relevant Objectives

Implementation of this Modification Proposal would further relevant objective d), securing of effective competition between Shippers and Suppliers as sending theft of gas tip-offs to the relevant Supplier will enable them to more effectively tackle instances of theft of gas, reducing the costs to consumers and Shippers.

Implementation will also further relevant objective f) as enabling the Transporter to release relevant data will ensure efficient administration of the UNC.

Implementation

As a self-governance modification it could be implemented sixteen Business Days after determination by the Modification Panel subject to no appeals being raised. The go-live date for the ETTOS is 1 September 2016.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No.

2 Why Change?

As part of the TRAS under the SPAA, Suppliers have agreed to create an ETTOS to manage tip-offs related to theft of gas across the energy industry.

To deliver the ETTOS the Supplier identity to the supply point will be required for the ETTOS Provider to match tip-offs to the relevant Supplier.

SPAA CP15/325 will introduce the service and relevant obligations on SPAA parties, however, for the service to be able to operated as intended it is necessary for Users to provide permission via the UNC for the identity of their Supplier to be made available to the ETTOS Provider.

3 Solution

This Modification Proposal will create the permissions necessary within the UNC to permit the release the Supplier identity of the supply point to the ETTOS Provider when they receive a tip-off of a potential theft of gas at a premise. This will enable the ETTOS Provider to provide the relevant Supplier with the tip-off information so that they can follow up as required.

User Pays	
Classification of the modification as User Pays, or not, and the justification for such classification.	N/A – permissions only
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 (i) & (ii)
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.	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) Security of effective competition between Shippers and Suppliers

Implementation of this Modification Proposal would further relevant objective d), securing of effective competition between Shippers and Suppliers as sending theft of gas tip-offs to the relevant Supplier will enable them to more effectively tackle instances of theft of gas, reducing the costs to consumers and Shippers.

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

Ensuring that relevant permission is in place to facilitate the ETTOS will improve the efficiency of administration of code elements relevant to theft of gas.

5 Implementation

As self-governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

6 Impacts

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No.

Pre-Project Nexus Implementation

Yes. Implementation is required pre-Project Nexus Implementation as the go-live date for the ETTOS is 1 September 2016.

7 Legal Text

Text Commentary

The legal text introduces a new permission for release of protected data. Paragraph 5.5.3 (l) describes the person to whom the data can be released (ETTOS), the circumstances of release (allegation of potential theft) and the data item (supplier identity).

Text

TRANSPORTATION PRINCIPAL DOCUMENT

SECTION V - GENERAL

Amend paragraph 5.5.3(j) to read:

“5.5.3(j) to any person pursuant to an application made in accordance with paragraph 7.3 (‘Other User Access’) of Schedule 23, version dated 7 November 2008, contained in the Supply Point Administration Agreement (‘SPAA’) 11th June 2004 made between the parties listed in Schedule 1 of the SPAA; ~~or~~”

Amend paragraph 5.5.3(k) to read:

“5.5.3(k) to the Performance Assurance Framework Administrator, provided the terms of the relevant PAFA Contract require the Performance Assurance Framework Administrator to maintain the confidentiality of such information on terms no less onerous than those of this paragraph 5, save to the extent disclosure of such information is necessary to comply with the terms of the PAFA Contract; ~~;~~ or”

Add new paragraph 5.5.3(l), as follows:

“5.5.3(l) to a person appointed pursuant to the SPAA to provide Energy Theft Tip-off Services (“**ETTOS**”) when information is received by that person of an allegation of a potential theft of gas at a premises and the identity of the relevant Supplier is required. For the purposes of the Code ETTOS shall have the same meaning as contained within SPAA”

8 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.