At what stage is this **UNC Modification** document in the process? **UNC 0XXX:** 01 Modification 02 Workgroup Report Must Read Process Grace Period for **Draft Modification** Report **Gaining Shipper** Final Modification **Purpose of Modification:** This modification is seeking to alter the obligation for Transporters to get a read on behalf of the Shipper when there has been a Change of Shipper event. The process is detailed in UNC TPD Section M 5.10.2. The alteration to the obligation will allow a grace period of 60 Supply Point Systems Business Days during which the gaining Shipper will be able to gain a read from their new Supply Meter before triggering 5.10.2. The Proposer recommends that this modification should be: subject to self-governance assessed by a Workgroup This modification will be presented by the Proposer to the Panel on 27/06/2019. The Panel will consider the Proposer's recommendation and determine the appropriate route. **High Impact:**

NΑ

NΑ

Medium Impact:

Low Impact:

Shippers/CDSP/Transporters

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Timetable

The Proposer recommends the following timetable:		
Initial consideration by Workgroup	27/06/2019	
Workgroup Report presented to Panel	18/07/2019	
Draft Modification Report issued for consultation	18/07/2019	
Consultation Close-out for representations	08/08/2019	
Final Modification Report available for Panel	12/08/2019	
Modification Panel decision	15/08/2019	



Contact:

Joint Office of Gas Transporters



enquiries@gasgove rnance.co.uk



0121 288 2107

Proposer:

Insert name



email address



telephone



Transporter:

Insert name



email address



telephone

Systems Provider:

Xoserve



UKLink@Xoserve.c

Other:

Insert name



email address



telephone

1 Summary

What

On a monthly basis Xoserve produces a report detailing all sites that have a MRF of Monthly where the shipper has failed to supply a Valid Meter Reading in the previous 4 months.

Notification of all these sites is sent to Shippers, providing the opportunity to procure and load a valid meter read before the Must Read process is commenced, however, these are only sent for large sites. At the end of each month (following the 4 month period, mentioned above) Xoserve instructs the Transporter to obtain a meter reading for all sites that still do not have a valid meter reading loaded on S&M. The Transporter performs a site visit and returns a meter read to Xoserve, if valid. If this falls over during a Change of Shipper event this is problematic as there is also no lead time for large sites or small sites.

For other sites that have meter read frequencies other than Monthly, for example 6 monthly, annual etc... If the Shipper has failed to supply a valid meter read to S&M for a period of 24 months Xoserve will initiate the Must Read process at the end of the 25th month. Xoserve instructs the Transporter to obtain a meter reading for all sites that still do not have a valid meter reading loaded. The Transporter performs a site visit and returns a meter read to Xoserve for loading, if valid.

The whole Must Read process is chargeable to the Shipper, where a Valid Meter Read is obtained. These charges can be broken down as follows;

- Xoserve administration charges, including invoicing
- Network administration charges, including cash collection
- Network site visit charges

A Valid Meter Read is detailed in TPD Section M paragraph 5.2.1.

Why

If the Shipper has newly gained a Supply Meter, and that Supply Meter within a matter of days or weeks of gain then triggers the requirement that the Transporter must read the Supply Meter on the Shippers behalf, the gaining Shipper is not given a sufficient timeframe to resolve any issues.

As the meter is often inaccessible due to a vacancy, and a CoS event is often accompanied by a Change of Tenancy, we believe a grace period on CoS to enable gaining Shippers to resolve the lack of read submission would negate the need for a large proportion of sites that fall into the Must Read Process.

As a Change of Shipper event is often concurrent with a Change of Tenancy event, the blocker for gaining a read will often be removed on Change of Shipper. This will reduce costs for the Transporter, Shipper, and ultimately the Customer.

It is also the case that a grace period of two months was included in the inspection process that was written into the Gas Supply Licence. This grace period on CoS was to enable the gaining supplier to

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perform an inspection on gain prior to becoming non-compliant due to no fault of their own. This obligation has now been replaced by health and safety legislation.

How

This modification will propose to amend Transportation Principal Document Section M 5.10 to add a stipulation that, if there has been a Change of Shipper event, the gaining Shipper has a grace period of 60 Supply Point Systems Business Days to gain a read before the Transporter is required to gain a read on the behalf of the Shipper under 5.10.2.

2 Governance

Justification for Self-Governance

The proposed changes do not have a material impact on Consumers, competition, the pipe-line system, management of the market or governance procedures. This modification is seeking to amend reporting criteria which would qualify as Self-Governance.

Requested Next Steps

This modification should:

- be considered a non-material change and subject to self-governance
- be assessed by a Workgroup

We would support this modification being reviewed under pre-modification discussions by the Distribution Workgroup.

3 Why Change?

Currently Change of Shipper events do not have any impact on the requirement that the Transporter must visit a gas Supply Meter if a read has not been provided within a given timeframe. As Change of Shipper is often concurrent with a Change of Tenancy, and a Transporter visit in these scenarios are often superfluous, this creates extra costs for the Shipper and ultimately to the customer.

4 Code Specific Matters

Reference Documents

UNC TPD Section M 5.10

Must Read Process Guide For Shippers

Knowledge/Skills

Knowledge of the Must Read process

5 Solution

This modification proposes to amend Transportation Principal Document Section M 5.10 to add a stipulation that, if there has been a Change of Shipper event, the gaining Shipper has a grace period

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of 60 Supply Point Systems Business Days to gain a read before the Transporter is required to gain a read on the behalf of the Shipper under 5.10.2.

Legal Text:

5.10.9 If a Supply Meter has undergone Change of Shipper, the Transporter will not be required to gain a meter read under 5.10.2 until 60 Supply Point Systems Business Days after the Change of Shipper date.

6 Impacts & Other Considerations

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

None

Consumer Impacts

None

Cross Code Impacts.

None

EU Code Impacts

None

Central Systems Impacts

There may be an impact on the system that produces the Must Read reports.

7 Relevant Objectives

Impact of the modification on the Relevant Objectives:			
Rele	evant Objective	Identified impact	
a)	Efficient and economic operation of the pipe-line system.	None	
b)	Coordinated, efficient and economic operation of	None	
	(i) the combined pipe-line system, and/ or		
	(ii) the pipe-line system of one or more other relevant gas transporters.		
c)	Efficient discharge of the licensee's obligations.	Positive	
d)	Securing of effective competition:	Positive	
	(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.		
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	

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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

This modification has a positive impact on d) - by enabling Shippers to resolve read issues on Change of Shipper, Shippers will be financially incentivised to get a read on CoS.

8 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.

9 Legal Text

Text Commentary

This text withholds the Transporter from entering into the must read process for 60 Supply Point Systems Business Days after the Change of Shipper date. This thereby restricts the Transporter getting reads and the costs that Shippers would incur from that process.

Text

5.10.9 If a Supply Meter has undergone Change of Shipper, the Transporter will not be required to gain a meter read under 5.10.2 until 60 Supply Point Systems Business Days after the Change of Shipper date.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that self-governance procedures should apply
- Refer this proposal to a Workgroup for assessment.