UNC Modification	At what stage is this document in the process?

UNC 0XXX:

(Code Administrator to issue reference)

Extending the PC4 Read Submission Window

01 Modification

02 Workgroup Report

03 Draft Modification Report

04 Final Modification Report

Purpose of Modification:

Under UNC TPD, M, 5.9.4, Shippers have 25 Supply Point Systems Business Days (SPSBD) after the read date to submit a read for settlement. Where there's an issue preventing the read from being validated, and that issue is not resolvable within the 25 SPSBD timeframe, the read becomes unusable. This is problematic for meter reads that are hard to retrieve. This modification seeks to extend the window beyond 25 SPSBDs.

Next Steps:

The Proposer recommends that this Modification should be:

- subject to Self-Governance
- proceed to Consultation.

This Modification will be presented by the Proposer to the Panel on dd Month 2024 *(Code Administrator to provide date)*. The Panel will consider the Proposer's recommendation and determine the appropriate route.

Impacted Parties:

Medium: Shippers, Suppliers, Consumers

Low: Distribution Network Operators, Independent Gas Transporters

Impacted Codes:

N/A

Contents

Timetable

Please provide proposer contacts and an indicative timeline. The Code Administrator will update the contents and provide any additional Specific Code Contacts.

Modification timetable: *(amend as appropriate)*

Pre-Modification Discussed	dd month year
Date Modification Raised	dd month year
New Modification to be considered by Panel	dd month year
First Workgroup Meeting	dd month year
Workgroup Report to be presented to Panel	dd month year
Draft Modification Report issued for consultation	dd month year
Consultation Close-out for representations	dd month year
Final Modification Report available for Panel	dd month year
Modification Panel decision	dd month year

Any questions?

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Proposer:
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Use email

Transporter:
Insert name and Organisation

email

telephone

Systems Provider:
Xoserve

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1 Summary

What

Under UNC TPD, in Profile Class (PC) 4, M, 5.9.4, Shippers have 25 Supply Point System Business Days after the read date to submit a read for settlement. Where there is an issue preventing the read from being validated, and that issue is not resolvable within the 25 Day timeframe, the read becomes unusable. This is problematic for meter reads that are hard to retrieve from the meter.

Why

Enabling more valid reads to be entered into settlement would decrease settlement imbalance, unbilled, Unidentified Gas (No reads at Line in the Sand is a UIG contributor), manual AQ fixes, repeated costs for additional site visits, and time and money spent on must-reads.

How

Read capacity concerns

Anecdotal evidence from 0851R indicates that 25 SPSBDs was put in place so prevent too many reads from being submitted to CDSP. It is higher than the 15 SPSBDs available pre-Nexus, but not too high that it would pose capacity concerns for CDSP.

However, 0851R workgroups have shown that CDSP systems capacity is not a concern: page 15 shows that on average 4.4 million (mn) reads are submitted to CDSP a day, with peaks of 11 mn well below the 32 mn capacity.

To add protection to CDSP, and to ensure that Shippers do stack their submissions towards the end of the submission window, this modification proposes the implementation of staggered benchmarks by which to submit a percentage of your total valid reads, as described in the solution section below. Staggered benchmarks allow the extension of the window so that problematic reads can have a fix applied and then be submitted for settlement, but protects settlement processes by having the majority of reads submitted early within the window.

It is the intention that the extended window will only provide extra time for those reads that need it due to complexity. E.g. a missed meter exchange

To guide how the staggered benchmarks should be set, PAC issued a Mandatory RFI to Parties, which essentially captures the time required for an extended read submission window.

Optimal read window

To ensure that the maximum amount of reads can be submitted to CDSP prior to CDSP's settlement processes running on the 10th of the month, CDSP performed analysis to see what the optimal SPSBDs should be. For one month extension the optimal read window would be 45-47 SPSBDs, for two month extension it would be 65-67 SPSBDs, three month extension it would be 85-87 SPSBDs. The impact of a read not being submitted before the 10th is that settlement would need to pushed into the next month's settlement run.

NB: as staggered benchmarks allow for reads to enter into in settlement that would otherwise not be included, a late reconciliation is preferable to no reconciliation at all.

2 Governance

Justification for Self-Governance

Self-Governance Criteria

The modification:

(i) is unlikely to have a material effect on:

(aa) existing or future gas consumers; and

(bb) competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes; and

(cc) the operation of one or more pipe-line system(s); and

(dd) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and

(ee) the uniform network code governance procedures or the network code modification procedures; and

(ii) is unlikely to discriminate between different classes of parties to the uniform network code/relevant gas transporters, gas shippers or DN operators.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- proceed to Consultation.

3 Why Change?

Under UNC TPD, in Profile Class (PC) 4, M, 5.9.4, Shippers have 25 Supply Point System Business Days after the read date to submit a read for settlement. Where there is an issue preventing the read from being validated, and that issue is not resolvable within the 25 Day timeframe, the read becomes unusable. This is problematic for meter reads that are hard to retrieve from the meter.

Enabling more valid reads to be entered into settlement would decrease settlement imbalance, unbilled, Unidentified Gas (No reads at Line in the Sand is a UIG contributor), manual AQ fixes, repeated costs for additional site visits, and time and money spent on must-reads.

4 Code Specific Matters

Reference Documents

CDSP analysis on impacts to settlement processes

5 Solution

For avoidance of doubt, figures in square brackets will be based on the RFI response and show consideration to the CDSP analysis on the optimal read window as described above.

BR1: Staggered Benchmarks

a. not less than [50]% are submitted by the [10]th Supply Point Systems Business Day after the Read Date;

b. not less than [80]% are submitted by the [25]th Supply Point Systems Business Day after the Read Date;

c. not less than [90]% are submitted by the [50]th Supply Point Systems Business Day after the Read Date

d. not less than [100]% are submitted by the [80]th Supply Point Systems Business Day after the Read Date

and the CDSP shall notify each User of its performance in such respect.

6 Impacts & Other Considerations

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

No.

Consumer Impacts

Where suppliers do not allow reads to be entered into billing due to failing validation, customers will have an improved billing experience.

Less need for repeat site visits to obtain meter reads, including Must Reads.

Less UIG would also be beneficial.

Impact of the change on Consumer Benefit Areas:

Area	Identified impact
Improved safety and reliability N/a	None
Lower bills than would otherwise be the case Billing could be aligned to an erroneous AQ and/or read. Slight positive if total UIG is reduced as UIG is a line item in the Energy Price Cap	Positive
Reduced environmental damage N/a	None
Improved quality of service N/a	None
Benefits for society as a whole N/a	None

Performance Assurance Considerations

This modification aims to increase settlement performance in Profile Class 4 by allowing time for problematic reads to become Valid Meter Reads.

Cross-Code Impacts

N/a

EU Code Impacts

N/a

Central Systems Impacts

An unintended consequence of this modification is that CDSP processes will run late due to Shippers submitting reads towards the end of the read submission window. This has been managed by the introduction of staggered benchmarks, and PAC are able to enforce non-compliance where appropriate.

7 Relevant Objectives

Impact of the Modification on the Transporters' 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.	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

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

Suggested wording of TPD, M, 5.9.4: "The requirement referred to in paragraph 5.9.3 is that, of the Valid Meter Readings obtained by a User pursuant to paragraphs 5.9.7 to 5.9.12 in respect of Relevant Class 4 Supply Meters on any particular Day:

~~"(a) not less than 50% are submitted by the 10th Supply Point Systems Business Day after the Read Date; (b) not less than 100% are submitted by the 25th Supply Point Systems Business Day after the Read Date"~~

"a. not less than [50]% are submitted by the [10]th Supply Point Systems Business Day after the Read Date;

b. not less than [80]% are submitted by the [25]th Supply Point Systems Business Day after the Read Date;

c. not less than [90]% are submitted by the [50]th Supply Point Systems Business Day after the Read Date

d. not less than [100]% are submitted by the [80]th Supply Point Systems Business Day after the Read Date

and the CDSP shall notify each User of its performance in such respect."

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Self-Governance procedures should apply.
- Issue this Modification directly to Consultation.