












UNC Modification		At what stage is this document in the process?
<h1>UNC 0664:</h1> <h2>Transfer of Sites with Low <u>Valid Meter Reading</u> Submission Performance from <u>Classes 2 and 3</u> into Class 4</h2>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #28a745; color: white; padding: 2px; display: inline-block;">01 Modification</div> <div style="border: 1px solid #17a2b8; padding: 2px; display: inline-block;">02 Workgroup Report</div> <div style="border: 1px solid #ffc107; padding: 2px; display: inline-block;">03 Draft Modification Report</div> <div style="border: 1px solid #ffc107; padding: 2px; display: inline-block;">04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>To create an obligation for Shippers to move <u>Supply Points</u> with low <u>Valid Daily Meter Reading submission</u> performance from <u>Classes 2 and 3</u> into <u>Class 4</u>, following a consecutive period of poor performance. <u>The</u> CDSP will automatically move any <u>Supply Points</u> not moved by the <u>Shipper</u> in such a scenario (after an allowed period of time).</p>		
	<p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> considered a material change and not subject to self-governance assessed by a Workgroup <p>This modification will be presented by the Proposer to the Panel on <u>19 December 2019</u>. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>	
	<p>High Impact: Shippers</p>	
	<p>Medium Impact: CDSP</p>	
	<p>Low Impact: Transporters</p>	

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Timetable			 07810 858716
The Proposer recommends the following timetable:			
Initial consideration by Workgroup	28 August 2018		
Workgroup Report presented to Panel	19 December 2019		 gurvinder.dosanih@cadentgas.com
Draft Modification Report issued for consultation	19 December 2019		
Consultation Close-out for representations	23 January 2020		 01926 653541
Final Modification Report available for Panel	30 January 2020		Systems Provider: Xoserve
Modification Panel decision	20 February 2020		 UKLink@xoserve.com

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1 Summary

What

This Modification was initially developed at PAC and is being monitored by PAC.

Post Nexus delivery Unidentified Gas (UIG) is shared out using weighting factors determined by the Allocation of Unidentified Gas Expert (AUGE), and currently less UIG is apportioned to Class 2 and Class 3 Supply Points than to Class 4 Supply Points. However, poor performance in the obtaining of Valid Readings from Supply Meters at Supply Points in these settlement classes does not improve the situation regarding temporary UIG but hinders it further. The PAC has been monitoring the situation over recent months, and it has become clear that poor performance can continue with no incentive (beyond Uniform Network Code (UNC) breach) to rectify the situation in the short term. For this reason, the PAC is seeking to create additional incentives in this area to ensure Shippers reach and maintain a minimum level of Valid Meter Readings that are submitted to the CDSF for both Classes 2 and 3 as established in the UNC.

Why

At present, while Valid Meter Reading submission performance targets are clearly laid out in the UNC TPD Section M, there is no further incentive to ensure Valid Meter Reading performance reaches a suitable level and is maintained. As it stands, without additional incentives, Shippers are able to move large numbers of sites (with potentially high associated energy consumption) into Classes 2 and 3 and therefore reduce their UIG exposure. Whilst reading submission in these classes has improved recently, there remain a number of shippers with significant sized portfolios in these classes who are submitting very low numbers of Valid Meter Readings to the CDSF and appear not to be operating effective business processes that meet the requirements of these classes.

How

The solution will create an obligation for Shippers to transfer those Supply Points in Classes 2 and 3 where the percentage of Valid Meter Readings obtained from the Supply Meters is below the minimum required standard into Class 4. Valid Reading submission performance will be measured at Supply Point level, with those Supply Points falling below a specified benchmark for a consecutive period being automatically transferred to Class 4. After an allowed period of time, where a Shipper does not move Supply Points that have fallen below the threshold in accordance with the obligation, the CDSF will automatically move those Supply Points into Class 4.

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2 Governance

Justification for Authority Direction

This Modification should follow Authority Direction procedures, as it could have a material impact on competition. The Modification proposes the introduction of obligations related to Valid Meter Reading submission performance for Class 2 and 3Supply Points to ensure Shippers that use the relevant settlement classes are able to fulfil the associated Valid Meter Reading submission obligations. As a result, there could be a material impact on competition and contractual obligations for Shippers and Suppliers.

Requested Next Steps

This Modification should:

- be considered a material change and not subject to self-governance
- be assessed by a Workgroup

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3 Why Change?

As it stands currently, performance targets for Valid Meter Reading submissions are clearly laid out in the UNC for all settlement classes. The current Valid Meter Reading submission targets for Class 2 and 3Supply Points as stated in UNC TPD Section M, stands at 97.5% of a Shipper's portfolio for Class 2, and 90% of a Shipper's portfolio per month for Class 3. However, Shippers can benefit from lower UIG weighting factors by moving sites into Classes 2 and 3, but with no incentive or link to minimum levels of Valid Meter Reading submission performance. Without this link, the additional readings available in these classes will not help the temporary UIG situation, but would further hinder it, potentially creating more unreconciled gas in these categories.

Since November 2017, the PAC has been monitoring levels of Valid Meter Reading submissions for Classes 2 and 3 as the post Nexus settlement classes have been taken up by Shippers. While take-up of Class 2 remains relatively modest, there are some 120,000 SMPs currently in Class 3. However, the post Nexus regime is now over two years old, and read submission performance remains poor, despite the CDSP offering and giving support to Shippers to improve meter reading submission levels. Given that this educative approach has not been successful to date, the PAC feels that further incentives are needed in this area to improve read submission levels for the new settlement classes.

The most recently reported (anonymous) read submission levels are below (as at July 2019). These reports will be updated once available.

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Read Performance as of Jul-19

Shipper Name	PC1	PC2	PC3	PC4
Ankara	20.00%	-	-	-
Apia	-	-	-	60.00%
Baghdad	-	-	-	16.67%
Bamako	0.00%	-	-	-
Baniul	-	-	-	87.04%
Berlin	-	-	46.03%	33.33%
Bern	-	-	-	0.00%
Bishkek	-	-	56.22%	0.00%
Bissau	-	-	-	0.00%
Bratislava	-	-	-	2.63%
Brazzaville	40.00%	88.17%	86.71%	60.86%

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Joint Office of Gas Transporters

Bucharest	-	-	84.82%	16.19%
Castries	-	-	-	0.00%
Dili	-	-	81.45%	39.83%
Djibouti	-	-	0.00%	63.44%
Dublin	-	-	-	25.00%
Gaborone	-	-	-	50.00%
Gitega	81.37%	41.94%	83.39%	16.35%
Hamilton	-	-	-	50.31%
Islamabad	-	-	-	25.20%
Jakarta	0.00%	-	-	-
Kampala	-	-	79.03%	50.00%
Kinshasa	-	-	-	55.26%
Lisbon	-	-	11.74%	31.23%
Luanda	-	29.95%	89.76%	77.47%
Luxembourg	-	-	-	50.00%
Maiuro	-	-	-	67.50%
Malabo	-	-	80.65%	0.00%
Manama	-	-	11.54%	66.78%
Maputo	-	-	-	0.00%
Marigot	-	-	0.00%	100.00%
Mogadishu	-	-	-	64.29%
Monaco	50.00%	-	67.20%	0.00%
Monrovia	-	-	-	54.89%
Nairobi	-	-	-	0.00%
Nassau	11.11%	-	-	0.00%
Nuuk	-	-	-	30.56%
Oranjestad	-	-	-	24.16%
Papeete	68.75%	41.38%	88.13%	76.19%
Paramaribo	-	-	-	0.00%
Philipsburg	80.86%	69.88%	3.23%	36.78%
Prague	-	-	-	33.33%
Praia	100.00%	50.00%	83.27%	40.85%
Pyongyang	-	-	-	0.00%
Quito	-	-	-	30.77%
Ramallah	76.00%	0.00%	-	59.70%
Reykjavik	82.14%	53.23%	87.10%	84.65%
Riyadh	0.00%	-	-	0.00%
Rome	78.46%	71.77%	96.79%	88.02%
Roseau	-	0.00%	59.41%	60.29%
Saipan	85.90%	43.34%	22.18%	75.69%
Sarajevo	-	-	-	55.81%
Seoul	-	-	56.07%	95.77%
Sukhumi	-	-	89.49%	22.68%
Suva	-	-	-	0.00%
Taipei	-	-	84.56%	44.44%
Tallinn	-	-	13.11%	59.83%
Tarawa	-	-	-	26.88%
Tehran	15.38%	88.71%	-	-
Thimphu	88.89%	52.26%	-	84.89%
Tiraspol	-	96.77%	-	-
Tripoli	-	-	-	0.00%
Tunis	-	-	-	16.67%
Valletta	50.00%	-	-	59.74%
Vilnius	-	-	-	81.67%
Warsaw	83.33%	0.00%	0.00%	0.00%
Washington	26.67%	64.52%	2.76%	74.51%
Industry Total	59.41%	45.73%	47.45%	60.87%

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The CDSP will be entitled to charge Shippers on a Supply Point basis for all Supply Points that it reclassifies from Classes 2 and 3 to Class 4 on behalf of Shippers in each calendar month. The CDSP will set out the charging rates and invoicing arrangements within the DSC Contract.

4 Code Specific Matters

Reference Documents

UNC TPD Section M - <https://www.gasgovernance.co.uk/TPD>

5 Solution

The solution will deal with the transfer of poor performing Supply Points (from Classes 2 or 3 to class 4),

New Defined Terms:

The following new defined terms will be required to be added to the UNC

Minimum Percentage Requirement

The minimum percentage of Valid Readings required over each Performance Period in order for the Supply Point to remain in Class 2 or Class 3. This will be set at 25% initially for both Classes 2 and 3, including those in EUC1 Class 3 where the measure will be based on Approved Readings. Where there is more than one Minimum Percentage Requirement in place across a Performance Period then the lower of the Minimum Percentage Requirements must be met for all of the Performance Period.

Performance Measure

The percentage of daily Valid Meter Readings Submitted, as measured by the CDSP, for each Supply Point in Classes 2 and 3 over each Performance Period.

Performance Period

The time period over which each Performance Measure will be derived. This will initially be set as a rolling 3 month period, but will be reviewed on an annual basis by the PAC. Where there is a change to the Performance period then all Performance Measures commencing from that date on will be on the revised Performance Period. Any Performance Periods in place at the date of the Performance Period change will be unaffected by the Performance Period change.

Lock-out Period

The time period over which Shippers will not be able to re-register Supply Points into Classes 2 or Class 3 that have been removed from either of these Classes due to them failing the Minimum Percentage Requirement. The Lock-out Period will begin on the day of re-registration into Class 4. The lock-out period will cease to apply if there is a change of Shipper at the Supply Point or if the Supply Point qualifies to be registered as a Class 1 Supply Point. The lock-out period will be initially set at 6 months and will be reviewed on an annual basis by the PAC. Where there is a change to a Lock-Out Period all Supply Points that are in a Lock-Out period will be subject to the shorter of the Lock-Out periods.

Notification of revised Minimum Percentage Requirement, Performance Period and Lock-Out Period

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Shipper Short Code	Class 3 Aggregate AQ as at 01/02/2018	Number Of Class 3 SMP's as at 01/02/2018	Number Of Class 3 Accepted Reads Submitted between 01/02/2018 and 28/02/2018	Number Of Class 3 Rejected Reads Submitted between 01/02/2018 and 28/02/2018	Average reads
151	2,103,633	13		256	57
242	43,919,500	1		25	26
206	711,180	1		0	0
617	2,205,334	12		208	402
219	2,141,742,577	13,638		6,305	3,431
214	72,478,166	6		0	299
171	15,573,626	2		0	0
223	827,866,234	57,417		307,137	789,322
181	3,124,972	18		14	6
208	806,137	2		2	0
272	435,953	2		4	0
920	912,841,858	6,421		3,601	2,820
Totals:	4,026,988,258	77,533		317,606	796,021

Class 2: f

Shipper Short Code	Class 2 Aggregate AQ as at 01/02/2018	Number Of Class 2 SMP's as at 01/02/2018	Number Of Class 2 Accepted Reads Submitted between 01/02/2018 and 28/02/2018	Number Of Class 2 Rejected Reads Submitted between 01/02/2018 and 28/02/2018	Average reads
050	317,714,234	26		979	33
151	36,397,171	1		75	85
003	55,041,415	1		179	2
012	126,926,300	5		140	2
152	43,022,657	1		20	0
333	1,381,924,334	70		4,156	41
272	100,999,345	8		196	0
920	37,278,633	2		202	1
343	82,305,816	3		196	0
Totals:	2,180,609,505	117		6,163	134

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For each Gas Year, the Performance Assurance Committee will maintain or revise the Minimum Percentage Requirement, the Performance Period and Lock-Out Period.

The Performance Assurance Committee will consult with the Uniform Network Code Committee on any revisions and provide the reasons for the revisions.

Not later than 31st August in the Preceding Year (and in sufficient time to meet CDSP system time constraints), the PAC will confirm to the CDSP any revisions, who will apply them from 1st October for the Upcoming Gas Year.

Where the Performance Assurance Committee is unable to or does not determine any revisions for the Upcoming Gas Year, the CDSP shall rollover all values applying in the Preceding Gas Year.

The business rules are below.

Business Rules

1. It is proposed that the current read provision obligations in section M, 5.7 and 5.8 are extended to add minimum individual Supply Meter Reading performance targets (Minimum Percentage Requirement). In addition to the existing portfolio level, Valid Read submission targets, each Supply Point registered in settlement Classes 2 and 3 will have Valid Supply Meter Readings measured daily.

2. While the existing portfolio level Valid Reading submission targets will remain (97.5% per day for Class 2, 90% per day for Class 3), in addition, each Supply Point will need to meet a minimum level of performance in any consecutive [3] month period. This Performance Period will be determined on an annual basis by the PAC. If any Supply Meter in either Class 2 or 3 provides less than [25%] of daily reads (the 'Minimum Percentage Requirement') across the consecutive period, the Supply Point will be required to be transferred to Class 4 following that period. This Minimum Percentage Requirement will also be determined on an annual basis by the PAC. 3. The table below demonstrates the mechanism for measuring Supply Point level read performance, where the number of accepted Valid Meter Readings provided for a Supply Point in any given month is recorded and measured to generate an individual monthly read submission performance.

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	MPRN 1	MPRN 2	MPRN 3	MPRN 4	MPRN 5	MPRN 6	MPRN 7	MPRN 8	MPRN 9	MPRN 10
Day 1	1								1	
Day 2	1	1							1	
Day 3	1	1				1			1	
Day 4	1	1				1			1	
Day 5	1	1				1			1	
Day 6	1	1				1			1	
Day 7	1	1			1	1				
Day 8	1	1			1	1				
Day 9	1	1			1	1				
Day 10	1	1				1				
Day 11	1	1				1				
Day 12	1	1				1				
Day 13	1	1				1				
Day 14	1	1				1				
Day 15	1	1				1				
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Day 21	1	1				1			1	
Day 22	1	1				1			1	
Day 23	1	1				1			1	
Day 24	1	1				1			1	
Day 25	1	1				1			1	
Day 26	1	1				1			1	
Day 27	1	1				1			1	
Day 28	1	1				1			1	
Day 29	1	1				1			1	
Day 30	1	1				1			1	
Day 31	1	1				1			1	
Total	29	12	0	1	14	21	0	5	4	0
Percentage	93.55%	38.71%	0.00%	3.23%	45.16%	67.74%	0.00%	16.13%	12.90%	0.00%

4. Read submission would be measured by the receipt of a Valid Reading, accepted into CDSP systems. For Class 2, this would be by Day+5, for Class 3, by the 10th day of the following month. The relevant percentage would be calculated for each Performance Period, calculated through the ratio of accepted reads by days across the Performance Period, which will be set initially as a 3 month period, and set on an annual basis by the PAC. Where there are instances of not all Class 3 reads being able to be loaded by the CDSP due to system constraints, there will be a separate measure for these sites based on an assured read target which will be determined by the PAC over the same Performance Period. This target will also initially be set at 25%.

5. Following a change of Shipper, Supply Point Valid Reading performance will be reset for the new Shipper. Performance measurement will begin from the 1st day of the next Performance Period after the change of Shipper for the Supply Point and so allowing complete months to be measured.

6. Reporting will be produced and sent to Shippers by the 20th day of each month and will highlight to Shippers all Supply Points where the individual Performance Measure has fallen below the Minimum Performance Standard. Notification and backing data containing the individual Supply Points will be sent to the relevant Shipper(s). Summary reporting will also be delivered to the PAC in a timely manner.

7. Affected Shippers will be obliged to change the class of the relevant Supply Points to Class 4 at the earliest opportunity, but in any event within 30 calendar days from receipt of the report. The only exceptions to this is where, during the Performance Period, any sites that have crossed the Class 1 threshold will not be required to be re-registered into Class 4, but will instead be subject to the rules requiring Class 1 registration and any sites designated as network sensitive sites at any point in the process will also be subject to the Class 1 registration rules.

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8. To allow for faulty meters and problematic sites any shipper that achieves the Minimum Performance Measure for at least 90% of their portfolio in either classes 2 or 3 for each Performance Period will not be required to transfer the remaining sites into Class 4 and so if these targets are achieved the whole portfolio will be deemed to have met the Minimum Performance Measure.

9. The Performance Measure will be solely based on the Performance Period. Any improvement in performance after a Performance Period, but prior to the registration into Class 4, will not be considered and cannot be used as a reason for non-registration into Class 4. Once a Supply Point is determined to have failed the Performance Target for a Performance Period the Supply Point will be required to be reclassified – regardless whether performance subsequent to the Performance Period, but prior to reclassification, improves such that the Supply Point would not have failed the Performance Target in the subsequent Performance Period.

10. Any Supply Points that move from Class 3 to Class 2 or vice-versa during the Performance Period will have to meet the Valid Meter Reading submission level of the lower target for the whole of the Performance Period.

11. If the identified poor performing Supply Points have not been registered into Class 4 within 30 days of receipt of the reports by Shippers, the CDSP will transfer those Supply Points to class 4, as soon as is practical.

12. Any Supply Points in Classes 2 and 3 transferred to Class 4 due to the failure to meet the minimum Performance Measure at the Supply Meter may not be transferred to Classes 2 and 3 for a minimum Lock-out period, which will initially be set at (6) months, from their transfer into Class 4. This Lock-Out Period will be determined on an annual basis by the PAC. This condition will not apply after a change of Shipper where the new Shipper will be able to change any Class 4 Supply Point into Class 2 or Class 3 in line with normal UNC timescales. This Lock-Out period will not apply to a Supply Point that requires to be re-registered from Class 4 to Class 1.

13. New reports will need to added to the Performance Assurance Register in order to compare Shipper performance in managing their Valid Meter Reading submission for Classes 2 and 3 Supply Points against the minimum submission at supply point level (not against the UNC portfolio level targets), by reporting on the number of sites which the CDSP has converted to Class 4, following failure to meet the minimum requirements at levels over the qualifying period.

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6 Impacts & Other Considerations

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

None identified.

Consumer Impacts

It should be noted that settlement classes do not necessarily correlate to customer products (in that settlement read submission does not necessarily impact the type of product offered to the customer by a supplier). If this were to be the case, non-submission of meter reads could potentially be detrimental to the customer – this Modification seeks to ensure that Shippers are able to appropriately manage the expected performance levels before moving Supply Points into these settlement classes.

However, this will need further consideration by the workgroup as there may be links to customer contracts that the Modification may need to consider.

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Cross Code Impacts

There may be an IGT UNC impact and this should be considered in the Workgroup.

EU Code Impacts

None identified.

Central Systems Impacts

There should be limited central systems impacts in relation to required class changes as the CDSP already has the facility to move sites in bulk across settlement classes (if needed). Some change may be needed in relation to the proposed charging mechanism and the establishment of reporting for the CDSP, PAC and PAFA.

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7 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:	Positive

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(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
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

This Modification proposes additional incentives to ensure timely submission of Valid Meter Readings for the relevant classes to be used for settlement purposes and to increase the accuracy of UIG. As such, more accurate and frequent read submission data in central systems should lead to more accurate cost allocation, and so, therefore, furthering competition and relevant objective d.

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8 Implementation

No implementation timescales are proposed at present.

9 Legal Text

To be provided by Transporters.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Authority Direction should apply
- Refer this proposal to a Workgroup for assessment.

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