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| UNC Workgroup Report | At what stage is this document in the process? |
| UNC 0862:  Amendments to the current Unidentified Gas Reconciliation Period arrangements |  |
| **Purpose of Modification:**  This Modification proposes amendments to the current Unidentified Gas (UIG) Reconciliation Period arrangements to reconcile UIG to the same months that the energy originated from (instead of smearing over previous 12 months). | |
| **Next Steps:**  The Workgroup recommends that this Modification should not be subject to Self-Governance.  The Workgroup asks Panel to agree that this Modification should proceed to consultation.  The Panel will consider this Workgroup Report on 18 July 2024 The Panel will consider the recommendations and determine the appropriate next steps. | |
| **Impacted Parties:**  High: Shippers, Distribution Network Operators, Consumers, Central Data Services Provider (CDSP)  None: Independent Gas Transporters and National Gas Transmission | |
| **Impacted Codes:** ~~iGT UNC (TBC) [N/A]~~ | |

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Summary

#### What

Currently, UNC states that the UIG Reconciliation Period is the period of 12 months ending with (and including) the Reconciliation Billing Period. (UNC TPD Section E - 7)

As a result, a Shipper is responsible for a percentage (%) of the UIG amendment for a site for 12 Months for the period of its ownership

This was put in place originally, because it was believed the majority of reconciliations would flow within 12 months, and rather than continue to share out the reconciliations over a long period, using 12 months would be less of a barrier to exiting the market.

In practical terms, if a site is taken over by a new Shipper or a Shipper leaves the market, the outgoing Shipper will still be responsible for the UIG charge on the amendment invoice for the site for 12 months, although this will gradually decrease over the 12-month period.

This arrangement does mean that UIG reconciliation is smeared equally across the previous 12 months (equally divided into 1/12 per month) rather than reconciling against the same month the energy originated from. If a change is not made, then the Unidentified Gas Reconciliation will continue to be smeared to the last 12 months instead of to the same months that the energy originated from, which is inherently more accurate and fairer than the existing arrangements.

#### Why

If a change is not made, then the Unidentified Gas Reconciliation will continue to be smeared to the last 12 months instead of to the same months that the energy originated from.

An increased number of supply meter points are being read on a monthly basis which means that the 12 monthly smear of UIG is now less accurate than it was historically.

When a party does seek to leave the market, the current 12 monthly smear of UIG means that their share of UIG does not always match their original allocations.

This Modification seeks to resolve the above points by amending the UIG reconciliation period to ensure that UIG is reconciled in the same month that the energy originated from, potentially mitigating the above discrepancies in how UIG is currently allocated.

**How**

The Proposal is therefore to reconcile UIG to the same months that the energy originated from (instead of smearing to the last 12 months) which is inherently more accurate and fairer than the existing arrangements

Governance

#### Justification for Authority Direction

This change is material as it has a significant commercial impact on parties, consumers, or other stakeholder(s); and therefore warrants Authority Direction.

#### Requested Next Steps

This Modification should be considered a material change and not subject to Self-Governance.

#### Workgroup’s Assessment

The Workgroup agreed with the Proposer’s assessment that Authority Direction is warranted for this Modification.

Why Change?

If a change is not made, then Unidentified Gas Reconciliation will continue to be smeared to the last 12 months instead of to the same months that the energy originated from. Due to the increase in monthly read sites, reconciling UIG in the month the energy originated from, means UIG reconciliation will be more accurate.

Code Specific Matters

#### Reference Documents

UNC TPD Section E – 7 <https://www.gasgovernance.co.uk/index.php/TPD>

#### Knowledge/Skills

Understanding of current UIG reconciliation process - <https://www.xoserve.com/help-centre/demand-attribution/unidentified-gas-uig/>.

Solution

The Business Rule(s) (BRs) are set out below:

BR1: Reconcile UIG to the same months that the energy originated from.

BR1 Note 1:The solution would not expect invoicing to be at Meter Point Level and the current invoicing format would be simply extended to cover the additional months.

BR1 Note 2: The solution expects that UIG would continue to be reconciled back to Line in the Sand to ensure that no UIG is left unaccounted for.

BR1: Note 3: For the avoidance of doubt other than an amendment to the UIG reconciliation period as set out in BR1, meter point reconciliation calculations and all other processes associated with UIG reconciliation are to remain the same.

BR1: Note 4: For the avoidance of doubt, UIG will be reconciled across the whole of the month that the energy originated from. Reconciliation will not be limited to the exact dates that month that the energy originated from.

BR 1 Note 5: For the avoidance of doubt it is anticipated that the new UIG Reconciliation Period will be effective from the Modification implementation date. For avoidance of doubt, this means that no transitional arrangements to implement this Modification will be required.

BR 1 Note 6: For the avoidance of doubt, LDZ Offtake Reconciliations, as defined in UNC TPD E7.3 and other offline reconciliation processes that currently feed the UIG smear will adhere to the new logic. This means that they will be calculated for the impacted months (which could include months from the current billing month back to the LIS date). This is anticipated to happen as a result of updating the UIG Reconciliation Period stated within TPD E.7.1.2.

BR2 For all UIG reconciliations where the Registered User is, at the time of the UIG Reconciliation Period, a Discontinuing User, TPD E7.5.4 should apply.

Impacts & Other Considerations

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

No.

#### Consumer Impacts

The existing arrangements lead to the smearing of UIG over the last 12 months despite it relating to a different period and this is a difficult concept to explain and to forecast for Consumers.

Workgroup participants agreed with the Proposer’s statement above.

#### What is the current consumer experience and what would the new consumer experience be?

As noted above, the outcome should be a more logical process with an outcome that is more accurate and easily understood by Consumers.

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| Impact of the change on Consumer Benefit Areas: | |
| Area | Identified impact |
| Improved safety and reliability | None |
| Lower bills than would otherwise be the case | None |
| Reduced environmental damage | None |
| Improved quality of service | None |
| Benefits for society as a whole | None |

**Performance Assurance Considerations**

Workgroup participants did not believe there was any settlement impact that the PAC would need to consider.

#### Cross-Code Impacts

[Potential iGT UNC impact – to be confirmed once legal text produced and reviewed.]

[None.]

[The Workgroup highlighted a potential impact on the IGT UNC but following review of the Legal Text, no impact was identified.]

#### EU Code Impacts

None.

Workgroup participants agreed with the proposer’s view that there would be no EU Code Impact.

#### Central Systems Impacts

From a system perspective, the CDSP will be required to reconcile UIG to the same months that the energy originated from (instead of smearing to the last 12 months).

A set of slides produced by the CDSP in February 2024, providing an example of the As-is and To-be UIG reconciliation apportionment process have also been included below to provide further context and to aid understanding:

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**Rough Order of Magnitude (ROM) Assessment**

A preliminary ROM was provided by the CDSP for discussion at the January 2024 Workgroup meeting and an updated version with minor amendments was provided by the CDSP for discussion at the April Workgroup meeting. The CDSP noted that the impacted processes currently fall under Service Area 10: Invoicing Customers which as per the Budget and Charging Methodology is split 12% NGT and 88% DNOs.

Whether a change to the Service Line is required as a result of this Modification will be determined at detailed design, however, the CDSP was keen to seek any views from the Workgroup to support later discussions within the DSC change process.

The CDSP noted that the Proposer of the Change and the DSC Change Management Committee can determine what the funding split should be. The Proposer noted that as this is a Shipper-driven Change they would expect it to be 100% Shipper-funded but would be happy to hear any alternate views from Workgroup participants. No alternate views were provided.

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| **Rough Order of Magnitude (ROM) Assessment**   |  |  | | --- | --- | | Cost estimate from the CDSP: | An enduring solution will cost at least £130k, but probably not more than £250k. No ongoing costs are anticipated but this will be confirmed at detailed design. | | Timescales: | The high-level timeline to deliver this change will take approx. 16 weeks, this does not include up to 4 weeks of Post Implementation Support (to include an amendment invoice cycle). | | Release Type: | The ROM indicated that the Change would either be a major or Ad-hoc / stand-alone release. The Workgroup questioned which of these options was more likely and the CDSP clarified that it would likely be part of a major release but that this would be determined by the DSC Change Management Committee and was unlikely to be this year (2024). | |

No further Workgroup comments on the ROM were received.

**Initial Representations**

None Received.

#### Panel Questions

None raised.

#### Workgroup Impact Assessment

The Modification has been discussed at the following Workgroup meetings:

* <https://www.gasgovernance.co.uk/0862/231123>
* <https://www.gasgovernance.co.uk/0862/250124>
* <https://www.gasgovernance.co.uk/0862/220224>
* <https://www.gasgovernance.co.uk/0862/280324>
* <https://www.gasgovernance.co.uk/0862/250424>
* <https://www.gasgovernance.co.uk/0862/230524>
* https://www.gasgovernance.co.uk/0862/270624

**November Workgroup Meeting (23 November 2023)**

The Proposer observed that the Modification was simple in concept and (initially) just had the one Business Rule (BR) – to amend the current UIG reconciliation arrangements to reconcile UIG to the same months that the energy originated from (instead of smearing over the previous 12 months).

However, both the Proposer and Workgroup noted that the complexity of the change was likely to be in the execution. The Proposer noted that the current arrangements are likely a legacy of the arrangements from Nexus, with the complexity at the time likely to be one of the reasons why the approach was taken to smear the UIG charge over the last 12 months.

The CDSP had reviewed the proposed business rule (BR) in advance of the meeting and the ‘BR Notes’ in the ‘Solution’ section above are a result of this review.

The Workgroup noted that further analysis would be needed to determine the potential impact of the Modification on Central Systems and processes and that December 2023 would likely be to soon for the CDSP to undertake this analysis. The Workgroup agreed that the next meeting should be deferred to January 2024 with an action placed on the CDSP to consider the best delivery path for this Modification and any transitional arrangements likely to be required.

The Workgroup also considered if there would be impacts resulting in additional costs for the DNOs to be passed on to Shippers and suppliers. It was noted that UIG is an energy only cost, without Transportation elements and if the Modification were to be implemented, the same amount of UIG would be attributed, so any costs would be just central system expenditure.

**January Workgroup Meeting (24 January 2024)**

A change-tracked version of the Modification was shared with the Workgroup, incorporating some further clarification points to BR1.

The Workgroup reviewed the updated Modification, noting that there did not appear to be any material changes. The Business Rules remained relatively simple, and the Proposer noted that the plan was that further detail will be provided in the form of a presentation at the February 2024 Workgroup meeting, looking at the ‘As-is’ and ‘To-be’ process.

The CDSP advised that a preliminary ROM had been produced, noting that a revised ROM may be required after the Modification had undergone further development at Workgroup.

The CDSP noted that currently, the way in which UIG is reconciled involves taking it and splitting it into 12 periods, each month there is a UIG reconciliation. Under the change proposed by the Modification, the UIG reconciliation would occur from a meter read occurrence, not necessarily within the 12-month process. The CDSP advised that on the surface the change should be relatively simple as Modification 0862 seeks to change the period that the Unidentified Gas Reconciliation is allocated against but does not seek to change any other element of how Unidentified Gas is reconciled.

In relation to the implementation of the Modification, the CDSP advised they were looking into whether this would be a big-bang approach or whether a transitional arrangement will need to be put in place. The big-bang approach is considered the best and easiest route as there would be no requirement for transitional rules. Further, in relation to implementation, there is a wide range for the costs. This is because CDSP does not anticipate ongoing costs. Further information relating to costs will be confirmed during the Detailed Design.

Further BR development was deferred until the February Workgroup meeting.

**February Workgroup Meeting (24 February 2024)**

The main focus of the February Workgroup meeting was a set of slides presented by the CDSP, providing some worked examples of the “As Is” and “To-be” UIG Reconciliation Apportionment process.

Workgroup participants recommended that the presentation slides be included as an Annex to the Modification, to provide context and to aid understanding. **A copy of the slides has been included within the ‘Central System Impacts’ section above.**

The CDSP began by providing some background to the current process and how it is carried out, noting that under the current business rules, UIG Reconciliation (charge type “UGR”) is shared out in a standard 12-month “pot” in each LDZ.

The CDSP provided an overview of the changes to the process being proposed by Modification 0862, noting that the Modification seeks to move away from the standard 12-month pot for normal UIG reconciliation. Instead, UIG Reconciliation would be apportioned across the same whole months as the meter point reconciliation that caused it, which could be anything from one month to 48 months.

The CDSP then presented a worked example of a fictional reconciliation for a weather-sensitive site for an 18-month period. This example showed how reconciliation processes assign the actual energy in proportion to the original allocation. I.e. proportionally more reconciled energy is associated to winter months than to summer months.

The CDSP also presented a further worked example of a fictitious LDZ with just two customer groups, one with weather sensitive data and the other with weather insensitive data. This example compared how UGR would be shared under the current arrangements, and under the approach proposed by Modification 0862. The example demonstrated how, under the proposed approach, the UGR would be shared out over 18 months, with monthly UGR amounts varying in line with the original meter point reconciliation.

The Proposer and Workgroup participants thanked the CDSP for presenting the examples, noting that they are very useful in aiding understanding of the process. The Proposer suggested that inclusion of an additional, 4-month example could also be useful to highlight the difference between the current and the proposed process. The CDSP agreed and took an action to provide an updated presentation with a new, 4-month example included.

The Workgroup agreed that the proposed Business Rules are ready for the development of Legal Text and the Joint Office took an action to submit a formal Legal Text request to Cadent at the March UNC Panel meeting.

**March Workgroup Meeting (28 March 2024)**

The Proposer noted that following feedback from the CDSP, some changes to the Business Rules and supporting clarification notes had been made to provide additional clarity, and that an updated version of the Modification would be provided. The following amended text was shared with the Workgroup:

* Removal of BR2: ‘This Change is to the UIG reconciliation period and will not result in changes to meter point reconciliation.’ It was noted that BR2 is covered within BR1 Note 3 and therefore is not needed.
* Addition of BR1 Note 5: For the avoidance of doubt, it is anticipated that the new UIG Reconciliation Period will be effective from the Modification implementation date. For avoidance of doubt, this means that no transitional arrangements to implement this Modification will be required.
* Addition of BR1 Note 6: For the avoidance of doubt, LDZ Offtake Reconciliations, as defined in the UNC TPD E7.3 and other reconciliation processes that currently feed the UIG smear will adhere to the new logic. This means that they will be calculated for the impacted months (which could include months from the current billing month back to the LIS date). This is anticipated to happen as a result of update the UIG Reconciliation Period stated within TPD E.7.1.2.

Workgroup participants agreed that the changes were likely to provide additional clarity for the Legal Text provider.

The Chair then shared the draft Workgroup Report with the Workgroup, highlighting areas where further discussion or amendment may be needed. A high level summary of the main discussion points is provided below:

* The Workgroup noted that there may be a consequential impact to the IGT UNC but that this would be subject to confirmation once Legal Text had been produced.
* The Chair noted that a preliminary Rough Order of Magnitude (ROM) had been produced, questioning whether a further ROM was required. The CDSP advised that nothing had changed since the preliminary ROM, suggesting that the provisional statement and reference to further ROM could be removed and the preliminary ROM would be resubmitted.
* The Workgroup discussed the inclusion of the CDSP Annex slides within the Workgroup Report. It was agreed that each slide should be included as they provide further context to the Modification.

The Workgroup noted that the next steps would be to review the legal text, the updated Modification and the updated Workgroup Report, before determining the timeline for implementation of the Modification.

**April Workgroup Meeting (25 April 2024)**

The Workgroup noted the updated Modification and changes made by the Proposer to reflect discussions at the March Workgroup meeting. The Workgroup did not raise any concerns or queries in relation to the amendments.

A Workgroup participant noted that the timeline has been set to review the Workgroup Report in July 2024 and asked whether Cadent would be able to provide Legal Text in advance of this date. The Cadent representative explained that they are working with the CDSP to draft Legal Text but that it is not straightforward. Nevertheless, they are aiming to have the Text ready for review by the May Workgroup meeting. Workgroup participants noted that the Legal Text is the most complex part of the process.

The Workgroup also discussed the updated ROM. The CDSP confirmed that minor amendments have been made to the ROM to remove any references to a second ROM as the Workgroup discussions have highlighted that the output of the original ROM still stands and that a further ROM will not be required.

The Workgroup noted that the next steps would be to review the legal text, to consider any associated iGT UNC impact, and to review an updated version of the Workgroup Report.

**May Workgroup Meeting (23 May 2024)**

The Cadent representative noted that the draft Legal Text had been produced by the lawyers but that it was currently being reviewed by Cadent and the CDSP and was not yet available for review by the Workgroup. The complexity of the Legal Text is due to the section of the Code that requires amendments. The CDSP provided an overview of the Business Rules, advising that wording had been added to Business Rule 1 as a note to provide further context. This note drew reference to TPD E 7.5.4 of the Code, to apply where the Registered User is, at the time of UIG Reconciliation Period, a Discontinuing User. Workgroup participants discussed the additional wording and concluded that it would be better to include it as an additional Business Rule rather than a clarification note. The Proposer agreed to submit an updated version of the Modification to reflect the change to the Business Rules.

**June Workgroup Meeting (27 June 2024)**

[The Workgroup reviewed the Legal Text provided by Cadent and were satisfied that it meets the intent of the solution defined in the Business Rules.]

[The Workgroup also undertook a review of the draft Workgroup Report and were satisfied that it provided an accurate reflection of Workgroup discussions.]

[Verify with Workgroup]

#### Reference Documents

None.

Relevant Objectives

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| --- | --- |
| Impact of the Modification on the Transporters’ 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 |
| 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 |

**Proposer’s view**

The Modification furthers Relevant Objective 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.

As it reconciles UIG to the same months that the energy originated from (instead of smearing over the previous 12 months) it better reflects the Shippers actual position thereby furthering effective competition.

#### Workgroup Assessment of Relevant Objectives

Workgroup participants agreed with the Proposers assessment above in relation to Relevant Objective d).

Implementation

No implementation timescales are proposed. However, this Modification should be implemented as soon as reasonably practicable following Authority direction to do so.

Legal Text

Legal Text has been provided by Cadent and is published alongside this report: [0862 Legal Text (26 June 2024)](https://www.gasgovernance.co.uk/sites/default/files/related-files/2024-06/MODIFICATION%200862%20-%20LEGAL%20TEXT%2896462547.1%29.pdf).

An Explanatory Table was also provided.

**Explanatory Table**

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| **Reference** | **Explanation** |
| **TRANSPORTATION PRINCIPAL DOCUMENT** | - |
| **SECTION E – DAILY QUANTITIES, IMBALANCES AND RECONCILIATION** | - |
| Amended paragraph 7.1.2 | To redefine the period in respect of which an Unidentified Gas Reconciliation relates to each month in relation to which an Offtake Reconciliation relates, i.e. the months during which the Reconciliation Metered Period occurs (rather than for a fixed period of 12 months) or the month in which the relevant adjustment is made.  This also means there is no longer any need to retain rules for monthly based Unidentified Gas Reconciliation for qualifying LDZ Reconciliation in paragraph 7.5, as the new generic rule now applies. |
| Amended paragraph 7.1.3 | To ensure the allocation mechanism (by reference to a User's offtake as a share of Users' aggregate offtakes) operates in the context of the month for which the Unidentified Gas Reconciliation is being carried out. |
| New paragraph 7.1.4 | Moved up from old paragraph 7.5.4 to ensure rule continues to apply in relation to a Discontinuing User and an Unidentified Gas Reconciliation Month. |
| Amended paragraph 7.2.1 | To make clear that in each Reconciliation Billing Period Unidentified Gas Reconciliation will be carried out for each LDZ and for each Unidentified Gas Reconciliation Month. |
| Delete paragraph 7.5 | As there is no longer any need to recognise the concept of 'Qualifying' LDZ Reconciliation, as all Unidentified Gas Reconciliation will now be carried out in accordance with paragraph 7.2. |

#### Workgroup Assessment

[The Workgroup has considered the Legal Text on 27 June 2024 and is satisfied that it meets the intent of the Solution.]

[Verify with Workgroup]

#### ~~Text Commentary~~

~~[Insert text/link here.]~~

#### ~~Text~~

~~[Insert text/link here.]~~

Recommendations

#### Workgroup’s Recommendation to Panel

[The Workgroup asks Panel to agree that this Modification should proceed to consultation.]

Appended Representations

Initial Representations – none