











UNC Modification	At what stage is this document in the process?
<h1 data-bbox="135 436 686 526">UNC 0XXX:</h1> <h2 data-bbox="135 571 1109 851">Extending the PC4 Read Submission Window from 25 to 45 Supply Point System Business Days</h2>	<div data-bbox="1209 427 1469 741"> <p>01 Modification</p> <p>02 Workgroup Report</p> <p>03 Draft Modification Report</p> <p>04 Final Modification Report</p> </div>
<p>Purpose of Modification:</p> <p>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 Supply Point Systems Business Days timeframe, the read becomes unusable. This modification seeks to extend the existing window from 25 to 45 Supply Point Systems Business Days thus enabling more reads to be usable.</p>	
<p>Next Steps:</p> <p>The Proposer recommends that this Modification should be:</p> <ul style="list-style-type: none"> subject to Self-Governance <p>This Modification will be presented by the Proposer to the Panel on DD MMM 2024. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>	
<p>Impacted Parties:</p> <p>Medium: Shippers, Suppliers, Consumers</p> <p>Low: Distribution Network Operators, Independent Gas Transporters, CDSP</p>	
<p>Impacted Codes: N/A</p>	

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Timetable		
Modification timetable:		
Pre-Modification Discussed	TBD 2024	
Date Modification Raised	TBD 2024	
New Modification to be considered by Panel	TBD 2024	
First Workgroup Meeting	TBD 2024	
Workgroup Report to be presented to Panel	TBD 2024	
Draft Modification Report issued for consultation	TBD 2024	
Consultation Close-out for representations	TBD 2024	
Final Modification Report available for Panel	TBD 2024	
Modification Panel decision	TBD 2024	

1 Summary

What

Under Uniform Network Code (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 meter read for Settlement. Where there is an issue preventing the read from being validated, and that issue is not resolvable within the 25 Supply Point System Business Days timeframe, the read becomes unusable from a Uniform Network Code perspective. This is sub optimal for meter reads that may become available later e.g., it might take longer than 25 Supply Point System Business Days if a site visit is required to obtain another reading 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 Unidentified Gas contributor), manual AQ fixes, repeated costs for additional site visits, and time and money spent on must-reads.

How

Read capacity

The 0851R - Extending the Annually Read PC4 Supply Meter Point (SMP) read submission window Workgroup discussions have identified that Central Data System Provider (CDSP) systems capacity is not a concern: [page 15](#) shows that on average 4.4 million reads are submitted to Central Data System Provider a day, with peaks of 11 million well below the 32 million capacity.

Incentivising timing Submission

To ensure that Shippers do not unduly delay their submissions to the end of the revised submission window, and thereby incentivise Settlement to be performed as promptly as reasonably practicable, this Modification proposes the implementation of staggered benchmarks by which to submit a relevant percentage of the valid reads obtained, as described in the solution section below.

Staggered Benchmarks

Staggered benchmarks provide additional surety when extending the window so whilst reads can be submitted later, noting that previously they would have been unable to be submitted, we minimize the risk of any backloading of reads being submitted.

Window length

It is the intention that the extended window should only provide extra time for those reads need it. This intention is reinforced by requiring that the majority of reads should be submitted within the earlier staggered benchmarks.

However, and for avoidance of doubt, this Modification will not prescribe that a meter read that does not require a correction prior to submission cannot be submitted within the later stages of the submission window.

To guide how the staggered benchmarks should be set, the Performance Assurance Committee (PAC) issued a Mandatory Request for Information (RFI) to Parties, which captured the time required for an extended read submission window.¹ Unfortunately, this was not conclusive on how long parties would reasonably require to be able to generally correct a read.

Rationale for approach

This Modification will therefore seek to increase the window from 25 to 45 Supply Point System Business Days to reflect the “sweet spot” identified in the analysis undertaken by the Central Data System Provider and set out below

Results – Number of SPSBDs until 9th of M+3

Performance Month	2023	2024	2025
January	47	47	48
February	46	47	47
March	45	47	46
April	47	48	48
May	50	50	50
June	49	50	50
July	49	49	49
August	50	50	50
September	50	50	50
October	47	47	47
November	48	47	48
December	49	47	47

	2023	2024	2025
Average	48.1	48.3	48.3
Minimum	45	47	46

Analysis suggests that 45 to 47 SPSBDs is the “sweet spot” to ensure that the processing window is only extended by one month (in the absence of exceptions etc)

Workgroup members are welcome to do their own version of this analysis to validate – or extend for future years – bank holiday calendars are available online [UK bank holidays - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

We believe the increase from 25 to 45 Supply Point System Business Days is prudent as it provides a no regrets solution that is based on analysis undertaken by the Central Data System Provider as part of the 0851R review group.

Difference to 0884 - Extending the PC4 Read Submission Window

We note that 0884 proposes to increase from 25 to 80 Supply Point System Business Days to align with the existing arrangements in the Electricity market. Whilst we have some sympathy with the proposer’s desire to align administration of reads across fuels, we do not believe this argument is robust in light of the transformative nature of the Market Wide Half Hourly program. We also note that 0884 proposed to replace “Obtained” with “Required”. For the avoidance of doubt, we note that we are not proposing any changes to the existing arrangements and believe obtained remains a better obligation than required.

¹ RFI documentation [here](#)

2 Governance

We believe this modification meets the Self Governance Criteria as it only extends the existing window in a limited fashion from 25 to 45 Supply Point System Business Days in line with the Central Data System Providers own analysis.

It also does not change the existing arrangements from obtained to required.

Requested Next Steps

This Modification should:

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

3 Why Change

Under Uniform Network Code (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 meter read for Settlement. Where there is an issue preventing the read from being validated, and that issue is not resolvable within the 25 Supply Point System Business Days timeframe, the read becomes unusable from a Uniform Network Code perspective. This is sub optimal for meter reads that may become available later e.g., it might take longer than 25 Supply Point System Business Days if a site visit is required to obtain another reading 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 Unidentified Gas 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

BR1: Change so in Under Uniform Network Code TPD, in Profile Class (PC) 4, M, 5.9.4, Shippers have 45 Supply Point System Business Days after the read date to submit a read for settlement

BR2: Introduce staggered benchmarks as set out below

- a. not less than 50% of relevant reads are submitted by the 10th Supply Point Systems Business Day after the Read Date;
- b. not less than 80% of relevant reads are submitted by the 25th Supply Point Systems Business Day after the Read Date;
- c. not less than 100% of relevant reads are submitted by the 45th Supply Point Systems Business Day after the Read Date; and the Central Data System Provider shall notify each User of its performance in such respect.

BR2 note 1: For avoidance of doubt this will enable reporting to be created throughout the staggered benchmarks shown in BR2. This could also help the Performance Assurance Committee monitor and manage Shipper performance in relation to read submission. The Performance Assurance Committee are able to request reporting if they believe it would be useful to them.

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

Enabling more reads to be submitted into Settlement will reduce the level of settlement inaccuracy within central systems

It will also reduce the need for repeat site visits to obtain relevant meter reads

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

- The inability of a shipper to load a valid meter read into settlement may also have knock on impacts for that read being entered into the customer's billing cycle.
- A secondary read request or site visit may also be required to gain a relevant new read.
- The customers AQ may not be updated correctly meaning that the supplier would have poor data on which to estimate a customer's bill.

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.	None
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 extra time for relevant reads to become Valid Meter Reads. It will also enable reporting to be created throughout the staggered benchmarks shown in Business Rule 2. This could also help the Performance Assurance Committee monitor and manage Shipper performance in relation to read submission. The Performance Assurance Committee are able to request reporting if they believe it would be useful to them.

Cross-Code Impacts

N/a

EU Code Impacts

N/a

Central Systems Impacts

The Central Data System Provider systems may require changes to facilitate the proposed increase to the 45 Supply Point System Business Days and to factor in the new staggered benchmarks for read submission. As noted earlier the Central Data System Provider has sufficient bandwidth to accommodate this change as we do not expect a material increase in the number of reads such as it would impact the existing headroom.

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

This Modification betters relevant objective a) as increased Valid reads will lead to increased settlement accuracy, allowing greater efficiency when transporting gas through the pipeline system.

This modification betters relevant objective c) as relevant shipper performance around read submission will be improved. This will have a knock-on impact on e) as it will reduce the secretarial burden required to interrogate read submission deficiencies.

8 Implementation

As this Modification requires CDSP system changes to facilitate a change in the 25 SPSBD read submission window, a change proposal will need to be raised for this Modification. As per the usual DSC Change process, the Change Management Committee will approve the implementation date for the associated change proposal. Therefore, implementation will align with system release.

9 Legal Text

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Self-Governance procedures should apply.