0884 :

Extending the PC4 Read Submission Window

Why change

Business case

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, as the CDSP systems would reject the meter read. 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.

Proposed change

Here's the legal text developed under 0851R

BR1: Staggered Benchmarks

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

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

c. not less than 90% are submitted by the 45th Supply Point Systems Business Day after the Read Date;

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

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

BR2: change "obtained" reads to "required" reads

Remove "obtained" and replace with 'Required' within 5.9.4 of TPD Section M.

For avoidance of doubt this will enable reporting to be created throughout the staggered benchmarks shown in BR1, if needed. For example, this could help PAC monitor and manage Shipper performance in relation to read submission. PAC are able to request reporting if they believe it would be useful to them.

Further considerations

Read Capacity: minor/no risk: on average 4.4 million (mn) reads are submitted to CDSP a day, with peaks of 11 mn well below the 32 mn capacity.

Gaming: minor/no risk. Today, 95% of reads are submitted within 10WD, and the introduction of staggered benchmarks prevents stacking reads to the end of the window.

Sweet Spot: is a relevant concept if shippers stack their read submissions to the end of the window. However, as 95% of reads are submitted within 10WD implementing timescales that align with the sweet spot is of minor importance.

Window length suitability:

- as window is to allow problematic reads to be resolved, a timeframe was chosen that allows for:
    - site visits, customer contact,
    - meter detail updates,
    - AQ fixes, and
    - (importantly!) volume to be processed.
- The RFI demonstrated that meter detail updates and AQ fixes could extend up to 80 WD.
- This presumably is less of an issue for non-domestic where the volume of MPRNs is lower.

Proposal to join 0884 with its alternate: To counteract this discrepancy, a separate rule could be created for non-domestic premises that only allows for 45 WD for the resolution of problematic reads.

Non-domestic timescales

Addition of BR3

BR3: Staggered Benchmarks for non-domestic properties:

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.