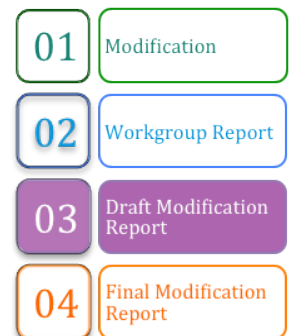


0466 / 0466A:

Daily Meter Reading Simplification

At what stage is this document in the process?



It is proposed that that the provisions of UNC TPD Section M4 be modified to reflect a number of changes to the requirements incumbent on Transporters to procure and process Daily Meter Readings.



Responses invited by 06 November 2014.



Medium Impact:
Shippers and Consumers

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About this document:

This Draft Modification Report is issued for consultation responses, at the request of the Panel on 16 October 2014. All parties are invited to consider whether they wish to submit views regarding the modifications.

The close-out date for responses is 06 November 2014, which should be sent to enquiries@gasgovernance.co.uk. A response template, which you may wish to use, is at www.gasgovernance.co.uk/0466.

The Panel will consider the responses and agree whether or not these modifications should be made.



Any questions?

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1 Summary

Is this a Self-Governance Modification?

The Modification Panel determined that this is not a self-governance modification as it is likely the proposed changes would be material to existing or future gas consumers.

Why Change?

The UNC identifies the terms under which Supply Meter Points are required to be Daily Read¹. The UNC further sets out the Transporters obligations for installing and maintaining Daily Read Equipment and procuring Daily Reads for provision to Users².

The majority of Non Daily Metered (NDM) Supply Meter Points registered on the Supply Point Register are subject to so called 'unbundled' Meter Reading arrangements. This means that for the purposes of UNC, Users are obliged to obtain Meter Readings at predetermined intervals and provide these to the relevant Transporter. This can be distinguished from 'bundled' arrangements which apply to Daily Metered (DM) Supply Points which reflect that the Transporter is obliged to obtain Meter Readings and subsequently provide these to the User. Under a bundled regime, choice in Meter Reading services is not available. The User is required to use the services of the relevant Transporter and pay charges as appropriate. Similarly, as the sole provider of read services, the Transporter is incentivised financially to meet required performance standards.

It is considered that the current UNC DM regime, which is largely unchanged from the implementation of the Transco Network Code in 1996 to be outdated and no longer 'fit for purpose'. This is particularly the case given the advent of new read procurement technologies. Furthermore, the present provisions are unduly restrictive and inconsistent with the need for Transporters to provide an efficient and cost effective service to Users and consumers. In addition, Modification 0466A considers the method used for transmitting within day data from DM loggers to shippers is particularly outmoded and is in need of improvement.

Consequently modification of the UNC is required to reflect present day and anticipated future requirements.

Solution

Modification of the UNC is proposed to facilitate the 'simplification' of Daily Meter Reading procurement and provision by the Transporter as set out in Section 3 below.

Relevant Objectives

This modification would enable Transporters to provide a significantly more efficient and cost effective Meter Reading service for DM Supply Points subjected to the Daily Read Requirement. The range of measures in these Proposals can therefore be expected to facilitate GT Licence 'relevant objective' (f) the promotion of efficiency in the implementation and administration of the Code.

Implementation

No implementation date has been proposed. Any implementation timetable would be contingent on system and process development timescales and would be subject to scrutiny by the UNC Committee.

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¹ [UNC TPD Section G1.5](#)

² [UNC TPD Section M4.1](#)

2 Why Change?

Meter Reading arrangements for the vast majority of Supply Meter Points under the UNC are 'unbundled'. This means that Users (Shippers) are able to appoint their Meter Reading agent of choice and provide Meter Readings to the Transporter in accordance with pre-determined frequencies as set out in the UNC. However, at present choice is not available to Users in provision of a Daily Read service with respect to 'mandatory' and 'voluntary' DM Supply Meter Points (including those subject to the Daily Read Requirement set out in TPD Section G1.5). Consequently the UNC features extensive obligations on Transporters to provide a 'bundled' Meter Reading service and therefore the costs incurred by Transporters in respect of obtaining such and the charges levied to Users cannot be avoided.

The current regime is virtually unchanged since inception of the Transco Network Code in 1996. The framework was designed around an original DM 'mandatory threshold' >75,000 TPA and encompassed approximately 25,000 Supply Meter Points nationally.

The existing population of DM Supply Points is sub divided into mandatory read (DMM) and voluntarily read (DMV) categories. DMV Supply Points will cease to exist from 1st October 2015.

Given recent developments in Meter Reading automated technologies and advances in communications infrastructure together with changes in the Transporters daily read data requirements, it is timely that the 'bundled' activities being those arrangements reflecting that the Transporter is the sole Meter Reading provider should be revisited and amended to reflect present day and anticipated future requirements.

The overall population of DMM and DMV Supply Meter Points has and continues to decline significantly. The following statistics are relevant;

- Interruption reform – for NGD the population has reduced to 4 DM Supply Points in two networks, reducing further to one (NW) network for the 2013 interruption auction.
- The current NGD population consists of 694 DM Supply Meter Points
- DMV is due to be eliminated (under UNC Modifications 0345 and 0441³) by 1st October 2015 enabling a further reduction to 190 DM Supply Meter Points
- The implementation of Modification 0428⁴ (as part of Project Nexus) is expected to further reduce the number of DMM Supply Meter Points.

The criticality of daily data availability for Transportation purposes has also reduced significantly. The data procured at DMM sites is now of only marginal benefit to Transporters.

The receipt of DMV data is of little or no benefit to Transporters.

However, a complex systems and process infrastructure is required to ensure current UNC obligations can be met by the Transporter. It has been identified that these 'legacy' systems are life expired and inefficient and are therefore costly to operate and maintain. Transporters are further constrained by the existing price control mechanisms with regard to the extent to which 'cost reflective' charges are able to be levied for DM Supply Meter Points⁵.

It is essential that the present outdated UNC provisions are simplified to maintain sustainable, 'fit for purpose' arrangements for the limited population of DMM and DMV Supply Meter Points which:

- Reduces costs for consumers
- Addresses present cost constraints
- Facilitates an opportunity for Transporters and Users to tailor future services

³ [Modification 0345](#) & [Modification 0441](#)

⁴ [Modification 0428](#)

⁵ [RDN Licence. Special Condition 4D. Restriction of prices in respect of Tariff Capped Metering Activities](#)

- Is consistent with the proposed UNC regime under the Project Nexus programme
- Ensures that all market participants can continue to fulfil their licence obligations in an improved manner.

3 Solution

Both modifications propose to simplify Daily Reading procurement and provision, with exception that Modification 0466 excludes the mandatory provision of within day read data which would be the subject of commercial terms which sit outside of UNC. Whereas, Modification 0466A proposes that such within day read data is continued to be provided using a robust method of transfer.

Modification 0466 excludes the text highlighted in **BLUE**, whereas Modification 0466A includes the text highlighted in **BLUE** and excludes the text in *ITALICS*.

Modification of the UNC is required to facilitate the 'simplification' of Daily Reading procurement and provision. This requires the following measures:

- Relaxation of the Transporters obligations to obtain Daily Meter Readings and provide these to Users from 11:00 am on D+1 to 12:00 pm on D+1. Also the provision would be subject to a 'reasonable endeavours' test
- Amendment to the 'Performance Relevant' standards of service (liabilities) associated with Daily Read provision as follows:
 - D+1 liability to apply to 14:00 ("liability cut-off time") on D+1.
 - D+1 Liability charge to reduce from £30 to £3
 - Remove the 97.5% performance standard in its entirety - that is, all failed reads will receive compensation

- **Periods of Outage**

A "Period of Outage" is recorded against a device when reads are not submitted to the user for a period of 4 consecutive days in a calendar month.

Where a Period of Outage occurs, the transporter will make the appropriate daily payment, by reference to the Level of Liability applicable for the month in which the Period of Outage occurred.

The payment will be made for each day, starting on the 5th day of failure, until a read is successfully submitted to the shipper by the liability cut-off time.

The liability payment associated with Periods of Outage will be a variable amount based on a transporters performance and will incentivise transporters to keep Periods of Outage to a minimum.

The "Period of Outage Failure Rate" ("POFR") for a transporter in any month will be calculated as follows:

$$\text{POFR} = (X / Y) * 100$$

- X = number of devices that have had one or more Periods of Outage in that month
- Y = number of devices that are installed on the last day of a month and that have successfully submitted at least one read to the user in that month

There will be four Levels of Liability associated with the Period of Outage standard.

- Level 4 = £75 (represents the current and initial value that will be applied in respect of this standard);
- Level 3 = £50 (represents the maximum value that can be incurred in respect of this standard, once this level has been attained);

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- Level 2 = £30;
 - Level 1 = £10 (which represents the minimum value that can be incurred in respect of this standard).
 - If the POFR is 2.5% or less for 3 consecutive months, then in subsequent months the liability payment will reduce by a level. If the POFR is greater than 2.5% in any a month, then the liability payment applied in the subsequent months will increase by a level.
 - Transporters will be required to make available “within day” data to users when requested so that this information can be provided by a more robust method than the current method of sending data by email – it is proposed that the existing IX file transfer process currently used for the majority of information exchanges within the industry is ideally placed for this.
- The transporters are free to make provision of within day data a chargeable service.
- *Removal of the provisions in TPD M4.6. which require Transporters to make available ‘within day’ data to Users. Note: it is proposed that Transporter undertakes, where it is feasible to do so, to provide either:*
 - “within day” data to the registered User, or;
 - an electrical access point to the daily read equipment in order to permit the User to collect its own “within day” data.

Such arrangements would not be part of the regulated DM mandatory service and would be made available outside the UNC on discrete commercial terms, (to be developed as demand dictates). For the avoidance of doubt no changes are proposed concerning the eligibility criteria for DM set out in TPD Section G1.5 including those concerning the Daily Read Requirement.

User Pays

Classification of the modification as User Pays, or not, and the justification for such classification.

Modification 0466 is a User Pays modification due to changes to central systems. However, Transporters have elected not to charge for the changes.

Modification 0466A - is User Pays based on the mandatory provision of a service for within day reads from a User specifically using the IX network.

Identification of Users of the service, the proposed split of the recovery between Gas Transporters and Users for User Pays costs and the justification for such view.

Modification 0466A - 100% to Users with DM supply points, allocated pro-rata to the number of each Users’ DM supply points (excl. DMEs) at the UNC Modification Implementation date. Allocating the costs to all such Users at this point in time is the fairest method for establishment of the service to avoid early-adopters incurring an undue share or, conversely, others waiting and accessing the service for free.

Proposed charge(s) for application of User Pays charges to Shippers.

Modification 0466A – User Pays costs in the range £0-20k apply to establish the service.

Note: An additional £1000 one off cost to set up a requesting User (Shipper) *may* apply, but is not User Pays (ie. on a contract specific basis).

Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.

ACS will be provided.

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4 Relevant Objectives

Impact of the modification on the 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.	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 (0466 and 0466A)
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

These modifications would enable Transporters to provide a more efficient and cost effective Meter Reading service for affected Daily Metered Supply Points. The range of measures in these Proposals can therefore be expected to facilitate relevant objective f) promotion of efficiency in the implementation and administration of the Code.

Members also considered objective c), concluding that it does not apply for the GT Licensees, as the change will benefit Supplier Licensees and is therefore out of scope.

5 Implementation

No implementation date has been proposed. Any implementation timetable would be contingent on any system and process development timescales and would be subject to scrutiny by the UNC Committee.

6 Legal Text

Legal Text has been prepared by National Grid Distribution at the request of the Panel, and no issues were raised by the Workgroup regarding its content.

Commentary

Two documents have been published alongside this report that explain how the Legal Text has been developed.

Text 0466

TPD Section M

Amend paragraph 4.6.1 to read as follows:

Where Daily Read Equipment is furnished and installed by the Transporter in accordance with paragraph 4.1.4 the Transporter ~~will, upon request by the Registered User and provided it is operationally feasible to do so make available to the Registered User, where, in the opinion of the Transporter it is feasible to do so and subject to terms agreed between the Transporter and User, provide to the User either:~~

- (a) ~~within-Day readings received from the Daily Read Equipment; or~~
- (b) ~~an electrical access point to the Daily Read Equipment to facilitate the collection of within-Day readings by the User, in respect of each hour of a Day, and provide such readings to the User at four hourly intervals.~~

Amend paragraph 5.2.1 to read as follows:

The Transporter will ~~use reasonable endeavours to provide not less than 97.5% of the required number of~~ Valid Meter Readings to each User, in respect of each month in each case not later than ~~44:00~~ 12:00 hours on the Day following the Day to which the relevant Meter Reading relates; and for the purposes of this paragraph, the required number of Valid Meter Readings in respect of a User in a month is the sum of the numbers of Performance Relevant Supply Meters of the User on each Day of such month.

Amend paragraph 5.2.2 to read as follows:

Subject to paragraph 5.2.3, if in respect of any Day following the Day to which the relevant Meter Reading relates the Transporter does not provide to a User a Valid Meter Reading by 14:00 hours on the Day following each such Day ("the liability cut-off time") the Transporter shall pay to the User the sum of £3.
~~any month the Transporters do not comply with the requirement in paragraph 5.2.1, the aggregate amount payable to the User shall be an amount calculated as:~~

$$((0.097 * A) - B) * £30$$

where for the relevant month:

A — is the sum for all Days in the month of the number of the User's Performance Relevant Supply Meters;

B — is the sum for all Days in the month of the number of Valid Meter Readings in respect of the User's Performance Relevant Supply Meters which the Transporters provided by 11:00 hours on the following Day which shall be invoiced and payable in accordance with Section S (Users).

Amend paragraph 5.2.3 to read as follows:

In respect of each Performance Relevant Supply Meter, if for each of 4 consecutive Days the Transporter does not provide to a User a Valid Meter Reading by the liability

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cut-off time 11:00 hours on the Day following each such Day then this shall be known as a "Period of Outage" and for each further Day (after the 4th) in respect of which a Period of Outage occurs for which the Transporter fails to provide a Valid Meter Reading by 11:00 hours on the following Day:

(a) the Transporter will pay to the User (subject to paragraph 5.2.4) £75 the appropriate liability payment as referred to in paragraph 5.2.7 below until such time as the Transporter provides to a User a Valid Meter Reading by the liability cut-off time; and

(b) such Meter shall not be counted as a Performance Relevant Supply Meter for the purposes of paragraph 5.2.2.

Add new paragraph 5.2.6 to read as follows:

A "Period of Outage Failure Rate" ("POFR") shall be calculated in respect of the number of Periods of Outage experienced by a Transporter during any month, as follows:

$$\text{POFR} = (X/Y) * 100$$

where:

X = the number of Performance Relevant Supply Meters in respect of which one or more Periods of Outage have occurred during that month

and

Y = the number of Performance Relevant Supply Meters which are installed on the last day of a month and which have successfully submitted at least one Valid Meter Reading to the User during that month.

Add new paragraph 5.2.7 to read as follows:

There shall be four levels of liability relevant to the Transporter in respect of Periods of Outage as follows:

- (a) £75 per Day, being a level 4 liability payment which shall be the maximum amount payable by a Transporter in respect of a Period of Outage unless and until a level 3 liability payment as referred to at paragraph 5.2.7(b) below is triggered;
- (b) £50 per Day, being a level 3 liability payment which, once triggered, shall be the maximum amount payable by a Transporter in respect of a Period of Outage;
- (c) £30 per Day, being a level 2 liability payment;
- (d) £10 per Day, being a level 1 liability payment which shall be the minimum amount payable by a Transporter in respect of a Period of Outage.

Add new paragraph 5.2.8 to read as follows:

In the event that the POFR is calculated at 2.5 or less for a period of three consecutive months, the Transporter's liability payment shall be reduced by a level in accordance with the levels referred to in paragraph 5.2.7.

Add new paragraph 5.2.9 to read as follows:

In the event that the POFR is calculated at more than 2.5 in any month the Transporter's liability shall increase by a level in accordance with the levels referred to in paragraph 5.2.7.

Text 0466A

TPD Section M

Amend paragraph 4.6.1 to read as follows:

Where Daily Read Equipment is furnished and installed by the Transporter in accordance with paragraph 4.1.4 the Transporter will, upon request by the Registered User, [1] ~~and provided it is operationally feasible to do so make available to the Registered User~~ subject to payment of appropriate charges by the User to the Transporter, provide to the User within-Day readings received from the Daily Read Equipment by means of a UK Link Communication.

Amend paragraph 5.2.1 to read as follows:

The Transporter will use reasonable endeavours to provide not less than 97.5% of the required number of Valid Meter Readings to each User, in respect of each month in each case not later than ~~44:00~~ 12:00 hours on the Day following the Day to which the relevant Meter Reading relates; and for the purposes of this paragraph, the required number of Valid Meter Readings in respect of a User in a month is the sum of the numbers of Performance Relevant Supply Meters of the User on each Day of such month.

Amend paragraph 5.2.2 to read as follows:

Subject to paragraph 5.2.3, if in respect of any Day following the Day to which the relevant Meter Reading relates the Transporter does not provide to a User a Valid Meter Reading by 14:00 hours on the Day following each such Day ("the liability cut-off time") the Transporter shall pay to the User the sum of £3. ~~any month the Transporters do not comply with the requirement in paragraph 5.2.1, the aggregate amount payable to the User shall be an amount calculated as:~~

$$((0.097 * A) - B) * £30$$

where for the relevant month:

A ~~is the sum for all Days in the month of the number of the User's Performance Relevant Supply Meters;~~

B ~~is the sum for all Days in the month of the number of Valid Meter Readings in respect of the User's Performance Relevant Supply Meters which the Transporters provided by 11:00 hours on the following Day which shall be invoiced and payable in accordance with Section S (Users).~~

Amend paragraph 5.2.3 to read as follows:

In respect of each Performance Relevant Supply Meter, if for each of 4 consecutive Days the Transporter does not provide to a User a Valid Meter Reading by the liability cut-off time ~~11:00 hours on the Day following each such Day~~ then this shall be known as a "Period of Outage" and for each further Day (after the 4th) in respect of which a Period of Outage occurs for which the Transporter fails to provide a Valid Meter Reading by 11:00 hours on the following Day:

- (a) ~~the Transporter will pay to the User (subject to paragraph 5.2.4) £75 the appropriate liability payment as referred to in paragraph 5.2.7 below until such time as the Transporter provides to a User a Valid Meter Reading by the liability cut-off time;~~
and
(b) ~~such Meter shall not be counted as a Performance Relevant Supply Meter for the purposes of~~ paragraph 5.2.2.

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Add new paragraph 5.2.6 to read as follows:

A “Period of Outage Failure Rate” (“POFR”) shall be calculated in respect of the number of Periods of Outage experienced by a Transporter during any month, as follows:

$$\text{POFR} = (X/Y) \times 100$$

where:

X = the number of Performance Relevant Supply Meters in respect of which one or more Periods of Outage have occurred during that month

and

Y = the number of Performance Relevant Supply Meters which are installed on the last day of a month and which have successfully submitted at least one Valid Meter Reading to the User during that month.

Add new paragraph 5.2.7 to read as follows:

There shall be four levels of liability relevant to the Transporter in respect of Periods of Outage as follows:

- (a) £75 per Day, being a level 4 liability payment which shall be the maximum amount payable by a Transporter in respect of a Period of Outage unless and until a level 3 liability payment as referred to at paragraph 5.2.7(b) below is triggered;
- (b) £50 per Day, being a level 3 liability payment which, once triggered, shall be the maximum amount payable by a Transporter in respect of a Period of Outage;
- (c) £30 per Day, being a level 2 liability payment;
- (d) £10 per Day, being a level 1 liability payment which shall be the minimum amount payable by a Transporter in respect of a Period of Outage.

Add new paragraph 5.2.8 to read as follows:

In the event that the POFR is calculated at 2.5 or less for a period of three consecutive months, the Transporter's liability payment shall be reduced by a level in accordance with the levels referred to in paragraph 5.2.7.

Add new paragraph 5.2.9 to read as follows:

In the event that the POFR is calculated at more than 2.5 in any month the Transporter's liability shall increase by a level in accordance with the levels referred to in paragraph 5.2.7.

7 Recommendation

The Panel have recommended that this report is issued to consultation and all parties should consider whether they wish to submit views regarding the modifications.

Panel Members have indicated that it would be particularly helpful if the following question(s) could be addressed in responses:

Respondents are asked to indicate how many sites they believe will take up the service.

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