

Joint Office
enquiries@gasgovernance.co.uk

07 August 2020

Dear Sir or Madam,

Re: 0691S - CDSP to convert Class 2, 3 or 4 Supply Meter Points to Class 1 when G1.6.15 criteria are met

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN offers does not support this Modification Proposal.

Reason for opposition:

Whilst we agree with the the principle of the CDSP moving sites into Class 1, when a Shipper User has failed to do so under their code obligations, the practicalities of this do not enable the intention of the modification proposal to be fulfilled.

Before a site can be moved into Class 1 it must have the required equipment installed. This requires the Shipper User to provide contact details to enable site access. The Shipper is the only UNC party that can request and provide these details. This part of the process is where the majority of delays seem to take place.

There are a number of complex steps, including the site access and actual install, that need to happen before the shipper can physically move the site into Class 1, therefore having completed all of these steps, it is unlikely the shipper would then fail to complete the simple final step. It is only this final late step in the process where the practicalities of this modification proposal allow CDSP to step in, and therefore is unlikely to be needed. As it is the earlier part of the process that delays sites being placed into Class 1, once they reach the threshold, this would often prevent the CDSP from fulfilling their obligation introduced under 0691.

In view of the above, we believe this adds a new obligation onto the CDSP both watering down the original one on the shipper, whilst leaving the shipper as the only party that can facilitate the install, in turn preventing the CDSP from fulfilling the new obligation. Therefore we feel that it does not further any of the relevant objectives, and is negative against f) Promotion of efficiency in the implementation and administration of the code.

It should be noted that if modification 0710 is approved, the relationship between the DMSP and CDSP will be direct, and a review of the process and legal text around the steps for a site to become Class 1 are already being looked at as part of this proposal. The changes proposed to be introduced by 0710 should facilitate improvements and would be the ideal

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opportunity for a new review to consider whether additional code changes, including CDSP intervention, can be facilitated and are required.

Self-Governance Statement:

This modification does not have any material impact as it is only seeking to build on existing obligations in code. This is further supported by our conclusion that it cannot enforce either the existing or transferred obligations. Therefore, it does not meet the criteria for Authority Direction.

Implementation:

What lead-time do you wish to see prior to implementation and why?

NGN does not believe this modification would have any effect without additional rights of access being introduced, or at least the introduction of a direct relationship between CDSP and DMSP (0710).

There are a number of process changes and additional reporting elements included in the 0691 proposal which could still be introduced regardless of whether this modification is approved. We believe these add improvements and should be independently progressed if 0691 is rejected

Impacts and Costs:

What analysis, development and ongoing costs would you face?

NGN has identified no analysis or development required and no additional costs incurred as a result of this proposal.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the Solution?

We believe the legal text provided could deliver the Solution set out in the modification from a code perspective, however as stated, due to process and contractual relationships the solution may fail to be fully utilised as designed and even introduce obligations that cannot be fulfilled.

We also find the legal text to be very detailed rather than principled, leading to potential dual governance with existing text in UNC TPD for example G 2.2.7 (b) introduced by this modification contains obligations already included under G 2.3.6

There are also the following minor typographical errors:

in 2.2.9 (a) 'CDSP0' should be amended to 'CDSP'

in 2.2.8 (a) & 2.2.8 (b) Supply Point Business Days should read Supply Point System Business Days

Are there any errors or omissions in this Modification Report that you think should be taken into account?

Include details of any impacts/costs to your organisation that are directly related to this.

None identified.

Please provide below any additional analysis or information to support your representation.

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NGN has included a draft process map to support this consultation response. This shows how we believe this is how the process would work in practice, with the GOLD section being process and/or obligation being introduced by 0691. We would like to caveat that this process map is a draft and not all steps have been fully mapped or checked.

This map is based on NGN and our DMSP, there will likely be some differences for other DN/DMSP relationships.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

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Site meets C1 requirements



Shipper provides access details for site



DMSP instals kit



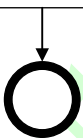
Shipper moves site into Class 1



DMSP update UK Link



Reads are received



Draft for the purpose
of UNC 0691 only

Key

Optional

Definite

The **GOLD** outlined sections are what 0691 proposes to introduce.

- The earlier one can be done via CP and will not need a modification
- The later one is the code change

The **Yellow** box is where there seems to be no specific defined process in place for notifications that this needs to take place etc

The **Purple** boxes assume the action is completed, (it does do not show a Yes/No exit on the mapping... but the question remains, how do we know if this stage is not completed, and what is done about it?)

Text in **red** is where the specifics of a flow etc are not currently known as part of this mapping process (map to be updated as this information is advised)

The **blue** line is where I have been advised that this happens, but it appears that even though it works in general, it is not actually the correct process. At the moment as part of this mapping process no alternative is known

