









UNC Final Modification Report		At what stage is this document in the process?
<div>UNC 0825:</div> <div>Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434</div>		<div><div>01</div>Modification</div> <div><div>02</div>Workgroup Report</div> <div><div>03</div>Draft Modification Report</div> <div><div>04</div>Final Modification Report</div>
<div><b>Purpose of Modification:</b></div> <div>To remove the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modifications 0434 and 0651.</div>		
<div><b>Next Steps:</b></div> <div>Panel consideration is due on 21 September 2023.</div>		
<div><b>Impacted Parties:</b></div> <div>High: CDSP</div> <div>Medium: Shippers</div> <div>Low: Transporters</div> <div>None: n/a</div>		
<div><b>Impacted Codes:</b></div> <div>UNC, IGT-UNC</div>		

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Timetable		 <a href="mailto:enquiries@gasgovernance.co.uk">enquiries@gasgovernance.co.uk</a>
<b>Modification timetable:</b>		 0121 288 2107
Pre-Modification Discussed	22 September 2022	Proposer: Alex Cebo EDF
Date Modification Raised	28 September 2022	 <a href="mailto:aleksandra.cebo@edfenergy.com">aleksandra.cebo@edfenergy.com</a>
New Modification to be considered by Panel	20 October 2022	 078 75 119 544
First Workgroup Meeting	27 October 2022	Transporter: Cadent
Workgroup Report to be presented to Panel	20 July 2023	 <a href="mailto:Gurvinder.Dosanjh@cadentgas.com">Gurvinder.Dosanjh@cadentgas.com</a>
Draft Modification Report issued for consultation	21 July 2023	 07773 151572
Consultation Close-out for representations	10 August 2023	Systems Provider: Xoserve
Final Modification Report available for Panel	17 August 2023	 <a href="mailto:UKLink@xoserve.com">UKLink@xoserve.com</a>
Modification Panel consideration	21 September 2023	

## 1 Summary

### What

As part of Project Nexus, Modification 0434 - *Project Nexus – Retrospective Adjustment*, put in place arrangements for Shippers to retrospectively replace Meter Information, Meter Readings, relevant Supply Point and Address data for the purposes of reconciling consumption at Supply Points.

The scope for these arrangements was amended by the implementation of Modification 0651- *Changes to the Retrospective Data Update provisions*. However, delivery of the amended arrangements has been delayed by the implementation of other major industry projects and it would be prudent to reconsider implementation of Modification 0434 as modified by Modification 0651 due to cost and delivery concerns.

### Why

The Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements originally put in place under Modification 0434 were descoped at the request of Project Nexus Steering Group (PNSG) because they were viewed as extremely difficult for Xoserve to implement without presenting significant risk to the delivery of the wider Nexus program. Since originally proposed in 2014, these arrangements have been deferred twice and then, following the conclusion of Request 0624R which sought to establish the cost benefit case and consider options, Modification 0651 was raised to amend the provisions of Modification 0434.

During development of the Modification 0651 solution, Xoserve carried out a Proof of Concept (POC) exercise to enable them to better understand the extent of the data misalignment between Shipper and Supply Point Registration systems. They have also subsequently clarified the potential costs of delivering a UK Link solution aligned to Modification 0651. Given the materiality of this solution and its associated costs and impacts, alongside the identification of an alternative solution, this Modification seeks to remove the remaining Modification 0434 arrangements as modified by 0651.

### How

The processes and obligations introduced by and set out in the Legal text awaiting implementation following the approval of Modification 0651 is to be removed. If the Authority approve the implementation of Modification 0825, within the decision letter we request the Authority confirm that this decision results in the non-implementation of 0651 as it will be superseded by 0825.

## 2 Governance

### Justification for Authority Direction

The Modification would remove certain arrangements from the UNC which were put in place following implementation of Modification 0434 and further amended by Modification 0651, both of which required Authority Direction, this would lead to a material change to the contractual arrangements between Shippers and Transporters.

### Requested Next Steps

This Modification should:

- should be subject to Authority Direction.

- be assessed by a Workgroup.

### 3 Why Change?

#### **Background to RAASP arrangements**

As part of Project Nexus, the arrangements to allow a Shipper to make retrospective updates to data held on the Supply Point Register were put in place; the arrangements being implemented as part of [Modification 0434](#).

Due to the complexity of the solution and the risk it imposed on delivery of the program, the decision was taken at the PNSG on 08 January 2016, to defer the RAASP elements of the retrospective arrangements. Modification 0573 was raised as an Urgent Modification by National Grid Distribution which had the effect of deferring the implementation of the RAASP elements of the arrangements until 01 October 2017. The arrangements put in place to allow for the retrospective update of Meter Readings was not impacted by the deferral and were implemented at Project Nexus implementation date 01 June 2017.

[Modification 0610S](#) further amended the arrangements by removing the ability for a retrospective adjustment to be made related to a change of applicable LDZ and applicable calorific value.

Consent to modify 057 was then raised and approved which further deferred the arrangements so that Shippers could not submit a Retrospective Data Update “on a Day prior to 01 November 2018”.

Due to the passing of time since the retrospective arrangements were conceived within Modification 0434 and due to the difficulty in providing a systematised solution (especially given Xoserve’s significant workload, most notably CSS, which restricted the level of large-scale change which can be progressed), Cadent raised a review group, [0624R](#). The purpose of Request Workgroup 0624R was to review the remaining, but as yet unimplemented, aspects of 0434 in order to inform the industry as to whether there was a robust business and cost/benefit case to justify proceeding with the development of a fully systematised RAASP solution.

Xoserve identified a number of potential options as to how RAASP might be delivered to varying levels of complexity and automation. This included 5 options to deliver RAASP, plus an alternative option. Please see the Workgroup Report for Request 0624R for the details. To get a clearer understanding of industry views Xoserve undertook a Request for Information (RFI) exercise which 16 parties (11 Shipper, 4 GT and 1 iGT) responded to.

The RFI did not provide an industry consensus on a way forward or a clear cost benefit case to proceed with building the Modification 0434 solution.

As a result of Request 0624R Cadent raised [Modification 0651](#) with the intent of replacing the remaining RAASP arrangements with Option 4 as identified by Xoserve and set out in the Workgroup Report 0624R. Option 4 - Data Cleansing Activity + Timestamp Asset Data, was identified as a more appropriate solution to achieve the desired RAASP arrangements which both provided functionality for Shippers to retrospectively amend RAASP data items and provided for a one-off data cleanse exercise to be carried out by Xoserve.

Modification 0651 was approved by Ofgem on 14 March 2019 but due to the requirement for new Xoserve system and process development work, the approved Modification was not given, and still has not been given, an implementation date.

#### **XRN4914 and Proof of Concept (POC)**

Following approval of Modification 0651, Cadent raised [XRN4914](#) – Retrospective Data Update Provisions on 25 March 2019 which allowed Xoserve to progress the delivery of Modification 0651 requirements. The scope of XRN4914 was two-fold:

- to put in place the necessary processes to facilitate an industry wide one-off asset data cleansing exercise
- to allow Xoserve to put in place the enduring RAASP Central System solution (Option 4 as identified in Workgroup Report 0624R).

The purpose of the data cleanse exercise was to correct existing data quality issues in one go ahead of provision of an enduring solution. The enduring solution would then provide Shippers with the functionality to correct retrospective data quality identified following the transfer of ownership of Supply Points.

The POC was completed and Xoserve presented their findings to industry at DSC Change Management Committee on 11 November 20. The details of the POC can be found here: [Proof of Concept - Deep Dive Analysis - Key Findings](#).

The POC assessed the impacts of implementing the solution within Modification 0651 (Option 4 as identified in Workgroup Report 0624R) and an alternative solution in addition to the Modification 0651 complaint solution or 0624R. The POC also provided industry with the details of data analysis conducted by CDSP which demonstrated that the implementation of RAASP solution would not bring the benefits to industry as intended when the change was initially reviewed. The solution options developed by CDSP were discussed further with the industry and a consultation was issued for views on how this should be progressed.

To confirm, 10 responses were received during this consultation with the following outcome:

- 1 voted to progress with the Modification 0651 option
- 4 voted to progress with the alternative option
- 2 voted to not progress either of the above options and;
- 3 voted to defer a decision.

It is acknowledged that the CDSP are responsible for delivering a Modification 0651 compliant solution which was agreed to be developed following the implementation of the Central Switching Service (CSS). The compliant solution has subsequently been reassessed by the CDSP in further detail and this has provided revised costs and estimates on delivery timescales. This assessment into the lower-level detail has identified significantly higher costs and increased delivery timescales which should be considered. Based on the above, Modification 0651 solution has not been developed further.

## **Conclusion**

It is evident, given the passing of time since implementation of Modification 0434 and approval of Modification 0651, that central system impacts and required development to implement a Modification 0651 compliant solution are complex, costly and are unlikely to deliver what the industry requires based on the current situation and responses received. It is also worth highlighting that since these solution option assessments have been undertaken as a result of Request 0624R, Modification 0651 and the POC, other industry wide changes have been implemented, potentially changing the landscape, for example, the Retail Energy Code (REC), CSS and individual changes impacting systems and processes.

Modification 0651 was directed for implementation on 14 March 19 by Ofgem at a date to be confirmed by Transporters, given the activities described above which have subsequently taken place, it no longer feels appropriate to proceed with the solution set out under Modification 0651.

Developments to date since the Authority Direction to implement Modification 0651 and responses from the options consultation highlights:

- limited support for the Modification 0651 solution
  - only 1 party voted in favour of the Modification 0651 solution out of 10 consultation responses

- a likely very high expense of a Modification 0651 systematised Central System solution
  - The revised costs associated with the implementation of RAASP complaint solution increased from £500k to £1.8m - £2.4m (exceeds the change budget)
- concerns regarding consequential impacts on all Shippers (socialisation of costs) following the use of 'retro updates' as envisaged by the Modification 0651 solution
- the Modification 0651 solution, regarding consumption adjustments, simply mirrors what can already be done today.

*Please note, any estimated costs or impacts relate to central system solutions and processes only. Potential customer impacts and costs have not been included as a part of the activities described above.*

As a result, this Modification has been raised.

## 4 Code Specific Matters

### Reference Documents

Retrospective Updates Nexus BRD

<https://www.gasgovernance.co.uk/sites/default/files/ggf/Retro%20Updates%20BRD%20v5.0.pdf>

Modification 0434

<https://www.gasgovernance.co.uk/sites/default/files/ggf/Final%20Modification%20Report%200434%20v2.0.pdf>

Retrospective Data Updates - CoMC 19/05/2021 [https://www.gasgovernance.co.uk/sites/default/files/ggf/2021-05/14.2%20Retro%20Data%20Updates\\_Action%200201\\_19.05.2021.pptx](https://www.gasgovernance.co.uk/sites/default/files/ggf/2021-05/14.2%20Retro%20Data%20Updates_Action%200201_19.05.2021.pptx)

Retro Option Paper Change Pack

[June 2021 Extraordinary Change Pack \(xoserve.com\)](#)

Modification

0573

<https://www.gasgovernance.co.uk/sites/default/files/ggf/Final%20Modification%20Report%200573%20v2.0.pdf>

Consent to modify 057

<https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2017-08/Consent%20to%20Modify%20C057.pdf>

Review Group 0624R

<https://www.gasgovernance.co.uk/sites/default/files/ggf/book/2018-02/Request%20Workgroup%20Report%200624R%20v2.0.pdf>

Modification 0651

[https://www.gasgovernance.co.uk/sites/default/files/ggf/book/2018-08/Final%20Modification%20Report%200651%20v2.0\\_1.pdf](https://www.gasgovernance.co.uk/sites/default/files/ggf/book/2018-08/Final%20Modification%20Report%200651%20v2.0_1.pdf)

Proof of Concept – Deep Dive Analysis – Key findings

[https://www.gasgovernance.co.uk/sites/default/files/ggf/2020-11/4.0%20ChMC\\_Retro%20Slides.pdf](https://www.gasgovernance.co.uk/sites/default/files/ggf/2020-11/4.0%20ChMC_Retro%20Slides.pdf)

Options consultation change pack

[June 2021 Extraordinary Change Pack \(xoserve.com\)](#)

Knowledge/Skills

Awareness/knowledge of Project Nexus would be useful.

5 Solution

This Modification seeks to remove the elements of Modification 0434 which have not been successfully implemented, i.e., the retrospective update of Meter Information (asset data).

For the avoidance of doubt this Modification will not remove the already implemented aspect of Modification 0434 to receive retrospective adjustments following submission of replacement Meter Readings.

Modification of the UNC is required to amend existing terms related to Retrospective Data Updates within TPD E, TPD M, TPD S and Transitional Rules TD11C, which were inserted following approval of Modification 0434. Business Rules:

- 1. Remove the Retrospective Data Update process from UNC.
- 2. Shipper Users will not be able to submit a Retrospective Data Update Notification.
- 3. The CDSP will not carry out a Retrospective Data Update and an adjustment to an Affected Offtake Reconciliation will not be undertaken.
- 4. Adjustments to Reconciliation Values should not arise in relation to the Retrospective Data Update process.

For the avoidance of doubt, the updates proposed to the UNC under Modification 0651 will not be implemented in the UNC.

6 Impacts & Other Considerations

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

No impact.

Consumer Impacts

None anticipated.

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

No impacts anticipated to the consumer experience.

Impact of the change on Consumer Benefit Areas:	
Area	Identified impact
Improved safety and reliability	None
No impact	

Lower bills than would otherwise be the case No impact.	None
Reduced environmental damage No impact.	None
Improved quality of service No impact.	None
Benefits for society as a whole No impact.	None

## Cross-Code Impacts

There will be an impact on the IGT UNC.

The Proposer confirmed the impacts of this Modification 0825 were discussed with the IGT UNC Workstream on 08 June 2023.

## EU Code Impacts

No impact.

## Central Systems Impacts

If implemented this Modification will ease the impact on central systems as a Modification 0651 compliant solution would not require implementing.

## Rough Order of Magnitude (ROM)

The CDSP representative confirmed at Workgroup on 25 May 2023 that this Modification would not have any cost associated with it. Rather, the expected costs associated with Modification 0651 solution would no longer apply if this Modification 0825 were approved.

## Performance Assurance Considerations

At the meeting on 25 May 2023 Workgroup Participants did not believe there were any PAC considerations associated with this Modification.

## Panel Questions

1. Workgroup to consider the financial arrangements associated with Modification 0651, any existing funding provisions and commitments, and the treatment of them in the event that Modification 0825 is approved.

The CDSP gave the following response to Workgroup on 29 November 2022:

*If Modification 0825 is approved and the retrospective functionality (due to be delivered under Modification 0651), is no longer required, the funds held by Xoserve for this purpose will be returned to the funding Transporters (89% DNOs and 11% National Grid NTS) and will therefore subsequently be factored into future transportation charges calculations.*

The CDSP representative confirmed the monetary value for this will be just over £1million. Workgroup Participants were satisfied with this explanation and had nothing further to add.



2. Workgroup are asked to present in the Modification Report an update of the Cost-Benefit Analysis for 0434/0651. And explain how the Net Cost or Net Benefit (as evidenced) informs their conclusions for 0825.

Workgroup Participants were satisfied with the cost information given by the CDSP representative and the Proposer and shown below, especially in relation to XRN 4914 (page 11-12 below) and believed it gives Panel enough information to make an informed decision on this Modification.

3. Workgroup are asked to note that this Modification is proposing to overturn a Modification that has already been directed by the Authority but not yet implemented.

Workgroup noted the above statement.

4. To clarify this very unusual situation the Workgroup are asked to confirm that Modification 0825 impacts on Relevant Objectives are either:

- i) new and therefore incremental to 0651 Relevant Objectives, or
- ii) a re-evaluation of the original 0651 impact in view of the passage of time.

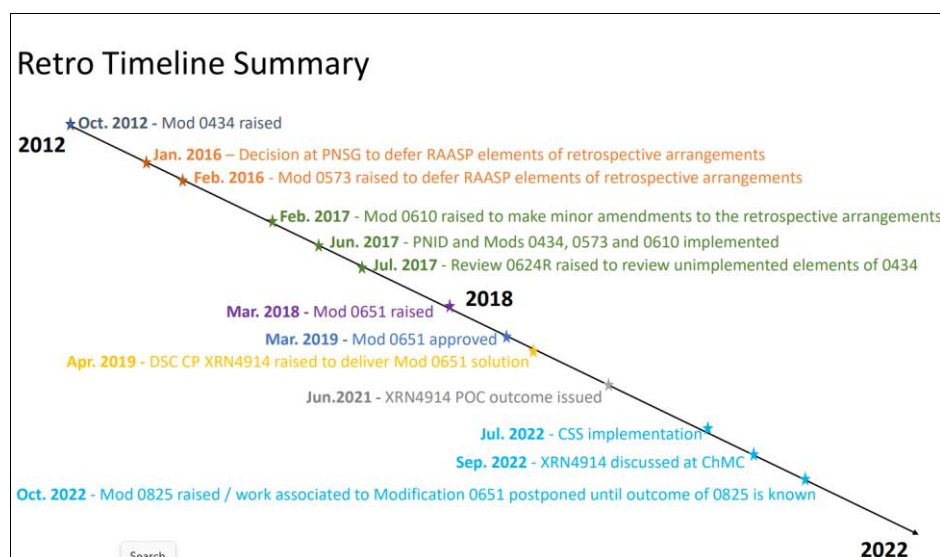
Workgroup Participants believed that the reasoning given in Section 7 under Relevant Objectives gives the detail required to answer this Panel Question.

## Workgroup Impact Assessment

Workgroup discussed this Modification at the following meetings:

- [Workgroup 0825 22 June 2023](#)
- [Workgroup 0825 25 May 2023](#)
- [Workgroup 0825 03 May 2023](#)
- [Workgroup 0825 23 March 2023](#)
- [Workgroup 0825 23 February 2023](#)
- [Workgroup 0825 31 January 2022](#)
- [Workgroup 0825 29 November 2022](#)
- [Workgroup 0825 02 November 2022](#)

On 31 January 2023, the Proposer gave Workgroup Participants an overview of what had led to the need to raise this Modification 0825, beginning with a timeline:



She then summarised what retrospective arrangements have been delivered:

- UNC Modification 0434 - *Project Nexus – Retrospective Adjustment*

This Modification related to the replacement of Meter Information, Meter Point/Supply Point and Address data. It contained 4 specific elements:

1. Replacement of Meter Readings;
2. Update of Meter Information (asset data);
3. Retrospective update to the Supply Point;
4. Address amendments.

Elements 2, 3 and 4 were collectively and informally identified by the acronym RAASP (Retrospective Adjustment of Asset, Address and Supply Point). Please note, Modification 0610 amended the original scope of elements 2,3 and 4. Some of the key changes included:

- Adding the principle that a retro update can only be for the Code Cut Off Date or before.
- Remove the ability to retro update address and CV data (this removed point 4).
- Remove AMR equipment and meter point status as a data item that can be retro adjusted (this removed point 3).
- Confirm retro updates won't be accepted for meter removal or isolation if reads have subsequently been accepted.

The first element was implemented on the Project Nexus Implementation Date (PNID) in 2017 through Modification 0434. Note – amendments to the original scope were made as a result of Modification 0610.

**Currently, item 2, Update of Meter Information (2) is still outstanding, the others have either been implemented or de-scoped.**

Workgroup reviewed the original provisions and purposes of Modification 09651. The following is an extract from Modification 0651.

Extract of UNC 0651 'Purpose of Modification':

This UNC Modification is seeking to amend those changes to the UNC identified within UNC Modification 0434 Project Nexus – Retrospective Adjustment specifically relating to Retrospective Data Updates, to incorporate the requirements of Option 4 as identified within the Request 0624R Review of arrangements for Retrospective Adjustment of Meter Information, Meter Point/Supply Point and Address Data Workgroup.

0651: Why?

Some consider that in their current form, the Retrospective Data Update elements of Modification 0434 give rise to a number of impacts and risks which have the potential to have an adverse impact on customers. These are as follows:

- *Reduces the incentive on Shipper Users to ensure data quality is 'right first time' and subsequently maintained.*
- Due to the expected development effort and delivery timelines, the changes necessary to implement the Retrospective Data Update solution within UK Link may adversely impact the implementation timelines of other expected major industry change; specifically, that associated with the Ofgem Faster Switching Program (OSP) and Central Switching Service (CSS).
- The full systematised Retrospective Data Update solution (Option 3 as identified by Request 0624R) *provides for an 'over engineered', costly to implement and maintain measure for which the benefits*

*are not proven and at best has a limited life span given the advent of Smart and Advance Metering technologies.*

Some consider the [Request 0624R Cost Benefit Analysis \(CBA\)](#) was incomplete as a consequence of ambiguous data provided by some industry parties and consequently did not provide the required evidence or sufficient justification for the high cost of a fully systematised Retrospective Data Update solution. Therefore, this should be replaced with a more appropriate and cost-effective approach to the benefit of customers.

#### 0651: Relevant Objective g)

Some participants consider the measures identified within this Modification Proposal can be expected to facilitate GT Licence relevant objective d). *This is because a new and proportionate Retrospective Data Update solution, combined with a data cleaning exercise would replace the existing, albeit unimplemented, solution identified in excess of 4 years ago which can be considered no longer appropriate in the present commercial environment.* The new solution represents a more efficient and economic way forward which, while providing a means whereby data can be retrospectively corrected, would encourage Shipper Users to proactively monitor and maintain accuracy of data relevant to energy settlement to the benefit of customers.

The Proposer further updated Workgroup on the outcome and position of Modification 0651.

At UNC Panel on 16 August 2018, there was not a majority decision to implement Modification 0651. Therefore, UNC Panel did not agree to recommend implementation. Modification 0651 was then sent to the Authority for its decision.

On 14 March 2019 Ofgem published their [letter](#) confirming their decision to approve implementation of Modification 0651. At the point of approval, Ofgem believed that the implementation of Modification 0651 would better facilitate the achievement of the relevant objectives of the UNC.

As a result of the Ofgem decision, the requirements related to RAASP as set out within Modification 0434 and 0610 were superseded by Modification 0651. Following this decision, the DSC Change Proposal ([XRN4914](#)) was raised and the Solution Review and Proof of Concept completed and assessed by the DSC Change Management Committee in March 2019. In June 2021 final costs were available for comparison as shown below. The 2021 cost is based on a post-CSS solution whereas the ROM under Modifications 0624R/0651 was based on the current UK Link at that time. Based on this, the expected time and effort to deliver the Modification 0651 solution has been increased.

*The table summarises the most recent assessment of the 0651 solution delivery compared to the high-level initial indication under 0624R.*

	Solution Analysis	
	Feb. 18 - 0624R analysis	Jun. 21 - XRN4914 solution review
Indicative CDSP implementation cost	460k - 515k (excluding MT)	1.797m - 2.396m
Indicative CDSP delivery timescale	Approx. 6 months	Approx. 18 - 24 months
Release type	Major Release	Standalone Major Release
Confirmed funding	Approx. 1.29m Funding by DNOs (89%) and NTS (11%)	

The significant changes in landscape since the approval of Modification 0651 include Retail Energy Code implementation in July 2022 and Smart meter roll-out which is ongoing.

Currently [XRN5482](#) - *Replacement of reads associated to a meter asset technical details change or update (RGMA)* will provide a mechanism for Shippers to replace an (Review of Gas Metering Arrangements) RGMA related read, actual or estimate, where that read is for a read date within their period of ownership. It is currently

expected this change will be implemented in November 2023 as part of the major release. This is essentially an alternative method for replacement of reads under certain circumstances.

At the meeting on 03 May 2023, Workgroup reviewed draft Legal Text noting that an explanatory Table would be required. This is now available here: <https://www.gasgovernance.co.uk/0825>

At the meeting on 25 May 2023 Workgroup again reviewed the legal Text and noted that paragraph numbering would be preserved by marking some as not used.

At the meeting on 22 June 2023 the Proposer confirmed the impacts of this Modification 0825 were discussed with the IGT UNC Workstream on 08 June 2023: <https://www.igt-unc.co.uk/8th-june-2023> .

## Implementation

At the meeting on 25 May 2023 Workgroup discussed the impact of any decision to approve Modification 0825 on the status of Modification 0651 and concluded that the following sentence should be placed in the Implementation section:

*If Ofgem approves the implementation of Modification 0825, within the decision letter Workgroup requests the Authority confirm this decision results in the non-implementation of 0651 as it will be superseded by Modification 0825.*

It was also suggested that a ‘for the avoidance of doubt’ statement could be added to the Solution section to say: If Ofgem approves the implementation of Modification 0825 Workgroup would require there is confirmation in the Decision Letter that this Modification is superseding Modification 0651.

The sentence above has been added to the implementation section of the Modification.

On 22 June 2023 Workgroup Participants wished to highlight this unusual implementation issue for Panel’s consideration.

Workgroup Participants had nothing further to add.

## 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.	None
b) Coordinated, efficient and economic operation of <ul style="list-style-type: none"> <li>(i) the combined pipe-line system, and/ or</li> <li>(ii) the pipe-line system of one or more other relevant gas transporters.</li> </ul>	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: <ul style="list-style-type: none"> <li>(i) between relevant shippers;</li> <li>(ii) between relevant suppliers; and/or</li> <li>(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.</li> </ul>	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

### Proposer's view

The Modification is positive in relation to Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code because it recognises:

1. The changing landscape of energy industry and the existence of the new Retail Energy Code (REC) and the REC Performance Assurance Board (PAB) which has responsibility for monitoring parties' performance in maintaining accurate data. Removing the remaining RAASP elements awaiting delivery under Modification 0651 will ensure there is clarity who is responsible for maintaining the data and overseeing data accuracy.
2. The industry progress made regarding the smart meter roll-out since the Authority decision to approve 0651 decision, which was one of the Authority's key considerations when approving modification 0651. As a result of this progress the original solution no longer delivers the anticipated benefits

### Workgroup view

All Workgroup Participants agreed that the explanations above described why this Modification furthers Relevant Objective f). Workgroup Participants commented that it has taken so long for Modification 0651 to be implemented and that industry has managed without any of the benefits it may have afforded that it now appears to be inefficient to implement on a cost basis.

Some Workgroup Participants were not content that the industry has taken so long to implement the Modification 0651 and that this situation was deeply unsatisfactory as a method for not making Authority Directed change. DSC Change Management Committee, under instruction from the Authority, prioritised CSS over Modification 0651. Then, [under instruction from UNCC](#) on 20 August 2022, progression on implementation of Modification 0651 should cease until Modification 0825 is completed.

Workgroup Participants did not believe any other Relevant Objectives are impacted by this Modification.

## 8 Implementation

Implementation should be as soon as possible following Authority Direction.

If the Authority approve the implementation of Modification 0825, within the decision letter we request the Authority confirm that this decision results in the non-implementation of 0651 as it will be superseded by 0825.

9 Legal Text

Legal Text has been provided by Cadent Gas and is published alongside this report <https://www.gasgovernance.co.uk/0825> .

The Workgroup considered the Legal Text on 25 May 2023 and is satisfied that it meets the intent of the Solution.

10 Consultation

Representations were invited from interested parties on 20 July 2023. All representations are encompassed within the Appended Representations section, including any initial representations.

The following table provides a high-level summary of the representations.

Implementation was unanimously supported in the 5 representations received.

Representations were received from the following parties:		
Organisation	Response	Relevant Objectives
Cadent	Support	f) positive
EDF	Support	f) positive
Northern Gas Networks	Support	f) positive
SGN	Support	f) positive
Wales & West Utilities	Support	f) positive

Please note that late submitted representations may not be included or referred to in this Final Modification Report. However, all representations received in response to this consultation (including late submissions) are published in full alongside this Report and will be taken into account when the UNC Modification Panel makes its assessment and recommendation.

11 Panel Discussions

12 Recommendations

13 Appended Representations

Initial Representation - None Received  
Representation – Cadent Gas Limited

Representation – EDF

Representation – Northern Gas Networks

Representation – SGN Limited

Representation – Wales & West Utilities

Cadent Gas Limited  
Pilot Way, Ansty Park  
Coventry CV7 9JU  
cadentgas.com

Bob Fletcher  
Joint Office of Gas Transporters  
Radcliffe House,  
Blenheim Court,  
Warwick Road,  
Solihull  
B91 2AA

Andy Clasper  
Andy.clasper@cadentgas.com  
Direct tel +44 (0)7884 113385

3<sup>rd</sup> August 2023  
Your Reference: UNC Modification Proposal 0825

UNC Modification Proposal 0825 – Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal to which Cadent supports.

**Do you support or oppose implementation?**

Support

**Relevant Objective:**

f) Positive

**Reason for support/opposition:**

The arrangements for retrospective adjustment of asset and Supply Point information (RAASP) were originally put in place under Modification 0434. Since this time, the arrangements have been deferred, reviewed and amended a significant number of times. This has been as a result of the difficulty parties have identified in designing an appropriate, beneficial solution which is cost effective.

It has become clear over time that given alternative solutions (including those identified by the proposer as justification for the Relevant Objectives), and the cost, and impact to all parties systems and processes of implementing retrospective arrangements, that it is the time to completely remove the retrospective arrangements put in place by 0434 and subsequently amended by 0651.



Workgroup also agreed that given the length of time it is taking to implement a viable solution, and given that industry has so far managed without the original perceived benefits RAASP may have afforded, that it now appears inefficient on a cost basis to implement.

This modification, if approved will remove from UNC all of the RAASP elements of 0434 and will disapply the implementation of 0651.

## **Implementation**

We agree with the proposer that implementation should be as soon as possible following Authority Direction.

## **Impacts and Costs**

Implementation of the modification will ensure time, effort and expenditure (from all industry parties) to put in place retrospective arrangements will not be required.

## **Legal Text**

We are happy that the legal text provides the intent of the modification.

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

No such errors or omissions identified.

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

Nothing further to add.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 07884 113385 ([andy.clasper@cadentgas.com](mailto:andy.clasper@cadentgas.com)) should you require any further information.

Yours sincerely,

Andy Clasper

## Representation - Draft Modification Report UNC 0825

### Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434

Responses invited by: **5pm on 10 August 2023**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Alex Cebo
<b>Organisation:</b>	EDF
<b>Date of Representation:</b>	10/08/2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

#### Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

As the proposer, EDF supports the implementation of this Modification Proposal.

The Modification proposes the removal of the arrangements for retrospective asset adjustments introduced under Modification 0434 and subsequently amended under Modification 0651 following the cost and benefit re-assessment in the context of the changing industry landscape.

The Modification recognises the changes in industry landscape (the introduction of Retail Energy Code and Performance Assurance Board) as well as the industry progress made in the smart metering rollout since the decision to approve the Modification 0651 which result in the original solution no longer deem to delivering the anticipated benefits.

It also acknowledges the length of time it is taking to implement the solution which following assessment is no longer deemed efficient on the cost basis to implement which resulted from the design complexities industry parties faced around defining the appropriate solution at the initial stages of the development.

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

We support the implementation date.

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

There are no costs associated with this change.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

We are happy with the legal text and that it reflects the changes proposed.

**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.*

No errors or omissions identified in the legal text.

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

No further comments.

Joint Office

[Enquiries@gasgovernance.co.uk](mailto:Enquiries@gasgovernance.co.uk)

10<sup>th</sup> August 2023

Dear Joint Office,

**Re: 0825 - Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434**

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 Supports this Modification Proposal.**

**Reason for Support**

This modification includes removal of the changes introduced by Modification 0651 *Changes to the Retrospective Data Update provisions*, which was approved in March 2019. Since then the CDSP has performed a proof of concept which showed that the implementation of the solution would have a minimal impact, whilst the cost of implementation considerable, we do not believe this to be an economic and efficient use of CDSP resources. Additionally the changes contained within 0651 regarding consumption adjustments already exist. Therefore as approval of 0825 would remove the obligation and consequentially the required system changes it would appear positive for Relevant Objective f) *Promotion of efficiency in the implementation and administration of the Code*.

**Implementation:**

As this is Authority Direction, it should be implemented on a date as directed by the Authority.

**Impacts and Costs:**

Any residual budgetary value would be returned to Transporters and would therefore be taken into account by future pricing.

**Legal Text:**

As the 0651 legal text has not yet been implemented, the removal of this is actually included in the solution, but rather Ofgem are requested in their decision letter to confirm that they also approve the non-implementation of modification 0651.

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

None identified.

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

None.

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,

Tracey Saunders (via email)

**Market Services Manager**

Mobile: 07580 215 743

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## Representation - Draft Modification Report UNC 0825

### Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434

Responses invited by: **5pm on 10 August 2021**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Sally Hardman
<b>Organisation:</b>	Scotland Gas Networks Ltd and Southern Gas Networks Ltd
<b>Date of Representation:</b>	10 <sup>th</sup> August 2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

#### Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

SGN offers its support for this modification. We agree with the overall objective to remove the retrospective element introduced by Modification 0434 Retrospective Adjustment of Asset and Supply Point information (RAASP). The implementation of Modification 0651 to realise the intent of Mod0434 has been deferred due to various industry wide Project's and the underlying complexity of a cost-effective solution to industry parties.

The modification supports Relevant Objective f) by acknowledging the progress made across industry codes and Smart Metering provisions. With progress made across industry in the interim without Modification 0651's retrospective solution it negates the need to implement a design which is both cost prohibitive and inefficient.

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

We support the proposer's position regarding implementation that this should be as soon as possible following Authority Direction.

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

SGN's expectation is that the implementation of this modification will lead to a saving in central system changes and associated costs to industry parties by negating the need to provide retrospective arrangements.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

SGN are satisfied that the legal text will facilitate the removal of the retrospection element put in place under Modification 0434.

Additionally, our expectation if approved by the Authority this modification will remove the unimplemented legal text and requirement to implement Modification 0651.

**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 that we have identified.

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

None.

## Representation - Draft Modification Report UNC 0825

### Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434

Responses invited by: **5pm on 10 August 2023**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Tom Stuart
<b>Organisation:</b>	Wales & West Utilities
<b>Date of Representation:</b>	9.8.23
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

#### Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

It is clear modification 0651, which modification 0825 is amending, no longer delivers the anticipated benefits therefore WWU supports modification 0825. This is a result of improvements in data accuracy and monitoring made possible by the introduction of the new Retail Energy Code and the activities of the Performance Assurance Board. The avoided spend will benefit industry parties and will be passed onto consumers through reduced transportation charges.

We agree that this modification furthers Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code.

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

This modification should be implemented as soon as possible.

#### Impacts and Costs: What analysis, development and ongoing costs would you face?

None

#### Legal Text: Are you satisfied that the legal text will deliver the intent of the Solution?

Yes

**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

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

None