

## Stage 01: Modification

# 0451

## Individual Settlements For Pre-Payment & Smart Meters

At what stage is this document in the process?

01

Modification

02

Workgroup Report

03

Draft Modification Report

04

Final Modification Report

Increase the accuracy of reconciliation of for SSP Pre-Payment and Smart Meters



The Proposer recommends that this modification should be:

- be treated as urgent and should proceed as such under a timetable agreed with Ofgem



High Impact:  
Small Suppliers



Medium Impact:  
Large Suppliers, Xoserve



Low Impact:

0451









Modification

3103 July-01 August 2013

Version 54.0

Page 1 of 9

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Contents		
1	Summary	3
2	Why Change?	4
3	Solution	5
4	Relevant Objectives	87
5	Implementation	98
6	Legal Text	98
7	Recommendation	98
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# 1 Summary

## Is this a Self-Governance Modification?

The Modification Panel determined this is not a self-governance modification

## Why Change?

Under the current regime all SSPs are subject to RbD, and their allocation is determined by the EUC1 banding. However as they have a higher visibility of their usage the profile of a pre-payment customer is flatter than that of a standard domestic credit meter (EUC1) customer, which effectively, ~~This~~ results in an over ~~stated gas~~ allocation of gas during the winter period and under allocation during the summer period for this sector of the market. ~~The impact of the disparity in allocation of costs compared to the billed consumption has a detrimental~~ ~~This can have~~ financial impact on shippers with above average proportions of pre-payment customers in their portfolio, and ~~implications which could affect shipper's allocation costs~~, especially smaller niche shippers that focus on this market sector. We have requested that this modification be given urgent status, as over this winter period we have seen our over allocation increase by over 10%, a figure which is not sustainable for any shipper, especially a small shipper.

## Solution

### It is proposed

~~We propose~~ that Xoserve develop, before the start of the 2013/14 gas year, an estimated profile for pre-payment meters using the pre-payment usage data ~~submitted by Winchester Gas~~ ~~we have provided to them~~, along with any ~~other~~ supporting data ~~available~~ from other shippers, ~~who submit it~~. Each month Xoserve would then calculate ~~energy allocations~~ ~~usage~~ based on this new profile, ~~along with~~ applying weather correction values. ~~Prepayment~~ ~~These~~ sites would then be reconciled after month end based on the average SAP price for that month. All supply points with either a pre-payment meter or Smart meter ~~operating~~, in pre-payment ~~pay~~ mode, would be ~~eligible to be~~ billed to this new profile. ~~It~~ ~~This~~ is intended ~~that this to be a short term~~ solution ~~will only apply to rectify this allocation issue~~ until the UK Link Replacement ~~is delivered~~ ~~comes into effect~~.

## Relevant Objectives

Implementation ~~of this proposal~~ would ~~facilitate effective competition by improving cost allocations, which would be more reflective of ensure greater accuracy of gas reconciliation within the gas consumed by pre-payment customers. It~~ ~~sector, which would also reduced~~ ~~decrease~~ the financial risk that ~~exposure~~ shippers, ~~particularly some~~ ~~especially~~ smaller niche shippers, ~~are exposed to, thereby facilitating effective competition by removing a barrier to competition~~ ~~have in being incorrectly allocated~~.

## Implementation

The urgent timetable set by Ofgem envisages a decision being made by 1 October 2013. Implementation could be immediate following a direction to implement. Although Xoserve would not expect to be in a position to immediately apply revised allocations from 01 October 2013, subsequent adjustments could be applied with effect from the implementation date. A retrospective calculation back to 01 October 2012 would also be required.

~~This will be subject to a ROM from Xoserve. We would also want this to be a retrospective modification from 1<sup>st</sup> October 2012~~

0451

Modification

3103 July 01 August 2013

Version 54.0

Page 3 of 9

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## 2 Why Change?

~~The is evidence that~~~~As stated above~~ pre-payment customers have a much flatter profile than that of credit customer. ~~Because pre-payment customers~~~~which they~~ are currently allocated under the RbD regime (EUC1B), this can cause them to be over allocated in the winter and ~~then~~ under allocated in the summer. The financial implications of this can be considerable, especially for smaller shippers ~~especially any~~ who concentrate on the pre-payment market. Due to the flatter nature of the pre-payment profile a shipper may find that over the course of the year the under and over allocations cancel themselves out in volume terms. ~~However, however~~ due to the variance of system buy and sell prices over the winter and summer months a shipper can find themselves with a considerable financial deficit. Having a profile that disadvantages any supplier that wishes to concentrate on this area of the market is a barrier to~~affects~~ competition ~~within the market place~~. This also means the pre-payment sector in effect has to pay for gas used by the credit sector which further disadvantages customers who on the whole tend to be of a lower income.

### 3 Solution

It is proposed ~~that~~ any pre-payment meter or Smart meter, in pre-pay mode, be reconciled on a profile ~~for~~ each LDZ, or group of LDZs dependent on the Transporters' Agent, on behalf of the Transporters, (referred to as Xoserve in the remainder of these business rules) ~~Xoserve's~~ judgement of the most appropriate approach to aggregating the available data, ~~1~~ derived for pre-payment meters rather than the current ~~EUC1EUC-1~~ profile which is based on the usage from a credit meter. Xoserve shall produce the pre-payment profile ahead of the gas year 2013/14 using the best data available to them at the time the profile is produced.

#### Detailed Business Rules:

##### 1. Scope

- 1.1 - Any supply point that has a pre-payment or smart meter, in pre-pay mode, which is held on the Supply Point Register (SPR) to be reconciled to the alternative pre-payment profile.
- 1.2 – For the multi-metered supply points the aggregated AQ will need to be below and remain below the LSP threshold and all meters must be either be pre-payment or smart meters in pre-pay mode for the supply point to use the alternative profile.
- 1.3 - It is intended that this modification will be superseded by the UK Link Replacement and the UNC modifications related to this.
- 1.4 – Xoserve will take a snap shot of all meter points that are shown on the SPR as having a pre-payment or smart meter on the 15<sup>th</sup> of the month (or nearest practical businessworking day) to identify the potentially eligible meter points.
- 1.5 – To identify the smart meters in pre-pay mode, each shipper ~~may~~will provide monthly, no earlier than the 16<sup>th</sup> of the month and no later than the 28<sup>th</sup> of the month, a list of meter points where they reasonably believe a smart meter ~~was~~is installed ~~and that is~~ operating in pre-pay mode on 15<sup>th</sup> of each month. This list will contain the MPRN. Any not in MPR and MSN and the Xoserve snapshot taken under 1.4 will not meter listed must be eligible. If a list has been provided by any Shipper in one month and no list is received in held on the following month, Xoserve shall use the list provided by the Shipper in the previous month. For the avoidance of doubt, any MPRN included in a list provided by Shippers is expected to remain there for a whole year – reports will be submitted by Xoserve to the Authority to provide reassurance that Shippers are not electing meter points only at times when a credit is expected ~~SPR.~~
- 1.6 – Any smart meter not in pre-pay mode, or in pre-pay mode that is not provided in the report in 1.5, will remain subject to the EUC1 profile.
- 1.7- No subsequent amendments to the snapshot taken by Xoserve nor the information provided by Shippers will be accepted nor actioned – the initial eligible supply point identification will be sacrosanct and this is a one-off adjustment, never to be revisited.

##### 2. Conditions for eligibility when the snap shot (1.4) is taken.

- 2.1 - Must be a SSP, with either a pre-payment or smart meter in pre-pay mode installed that is held on the Supply Point Register. The status of the smart meter will be determined by the monthly shipper report in 1.5.
- 2.2 - For the avoidance of doubt, it is proposed that this modification is applicable only to supply meter points on Large Transporter networks, i.e. excluding iGTs.
- 2.3 - The following events will automatically cause the meter point to revert to being subject to the EUC1 Profile:
  - i. The meter is exchanged and a dumb credit meter is installed.
  - ii. The smart meter is changed to credit mode.
  - iii. As part of an AQ review or appeal the supply point of which the meter point is part becomes an LSP.

##### 3. Energy and Transportation Reconciliation

- 3.1 – The supply ~~meter~~ point remains in the SSP regime for all purposes except it will be subject to the new pre-payment profile rather than the EUC1 profile.
- 3.2 - Energy allocation on the day is unchanged – the supply ~~meter~~ point retains the same EUC and ALP. WAR bands do not apply.
- 3.3 - The supply points will be billed after month end on an unchanged basis.
- 3.4 - Each reconciliation billing periodmonth, for eligible supply points identified by Xoserve in accordance with paragraph 1, a subsequent credit or debit will be calculated as the difference between the energy and transportation commodity

0451

Modification

3103-July-01 August 2013

Version 54.0

Page 5 of 9

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charges allocated (as in 3.2) and the energy and transportation commodity charges that Xoserve calculate would have been allocated based on the derived pre-payment profile, with appropriate adjustments made for weather. To derive values, energy will be multiplied by average SAP for the reconciliation billing period. Transportation charges will be based on the applicable charging statement for the reconciliation billing period.

#### 4. Reconciliation by Difference

4.1 – The volumes and values under 3.4 are assigned to the annual reconciliation pot (E7.2.1 (b)) and therefore fall within RbD. The supply points within the ambit of RbD remain unchanged – i.e. sites eligible under paragraph 1 remain in RbD.

#### 5. Threshold CrossersAQ Review

5.1 – If due to any reason an eligibleAQ appeal a meter point crosses the threshold from an SSP and moves becomes an LSP and the re-confirmation is after the 15<sup>th</sup> of the month it will continue to benefit frombe reconciled based on the alternative pre-payment profile until the end of the month inend, after which the snapshot was takenpoint it will be reconciled as an LSP.

#### 6. Change of Shipper

6.1 – If a change of shipper occurs after the 15<sup>th</sup> of the month the losing shipper will continue to receive the invoice calculated in accordance with 3.4 until the month end based on the alternative pre-payment profile, after which the gaining shipper will then be reconciled going subject to the 3.4 mechanism going forward.

#### 7. Charging

7.1– The User Pays approach applies for development and ongoing costs, with Shipper invoices based on market share of all SSPs on [15] September 2013 for development costs. A transactional basis is proposed and on [15<sup>th</sup>] of each month for ongoing costs, with charges based on each Shipper's share of the number of meter points that are adjusted each month...-

#### 8. Retrospection

—8.1 – During [October] 2013 Xoserve will run the snap shot report in 1.4 historically for the period 1<sup>st</sup> October 2012 to 30<sup>th</sup> September 2013 to identify those sites eligible for the alternative pre-payment profile as per the conditions in paragraph 2. The shippers will also run the report in 1.5 for the same period so that the smart meters in pre-payment mode can be identified. A shipper will need to of provided this report by the [31<sup>st</sup> October] 2013 for the supply points to be re-billed. Xoserve will calculate the difference between the energy and transportation commodity charges allocated and the energy and transportation commodity charges that would have been allocated based on the derived pre-payment profile, with appropriate adjustments made for weather for the period 1<sup>st</sup> October 2012 to 30<sup>th</sup> September 2013. A subsequent credit or debit will then be issued to each shipper.

#### User Pays

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

*Classification as user pays due to the change that would be required within Xoserve's systems*

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.

*100% cost to users*

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

0451

Modification

3103-July-01 August 2013

Version 54.0

Page 6 of 9

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*All shippers based on their SSP market share on ~~{15}~~ September 2013 for development costs A transactional basis is proposed ~~and on {15<sup>th</sup>}~~ of each month for ongoing costs, with charges based on each Shipper's share of the number of meter points that are adjusted each month...:-*

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

Xoserve development costs are expected to be in the range of £300k to £500k. Ongoing costs are expected to be under £20k per month. ~~TBC~~

## 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.	Positive
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.	None
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

D - Accurate cost allocations are a fundamental underpinning of a competitive market. Implementation would allocate transportation and energy costs differently, with some Workgroup attendees believing this would more accurately allocate costs by better recognising the true usage pattern of PPM s over the year. More accurately reconciled on this sector of the market is especially important for any smaller supplier which would want to focus on this area. Rejection of this modification could have a detrimental effect on competition as it could put smaller suppliers focussing on this market in a position they cannot sustain, creating risk and uncertainty as the impact is volatile and unpredictable. [Having a profile that disadvantages any supplier that wishes to concentrate on this area of the market is a barrier to competition.](#)



## 5 Implementation

The urgent timetable set by Ofgem envisages a decision being made by 1 October 2013. Implementation could be immediate following a direction to implement. Although Xoserve would not expect to be in a position to immediately apply revised allocations from 01 October 2013, subsequent adjustments could be applied with effect from the implementation date. A retrospective calculation back to 01 October 2012 would also be required.

The Workgroup believe this modification should be implemented as soon as possible following the decision from Ofgem. They anticipate the decision to be made as soon as possible but no later than the 30 September 2013.

## 6 Legal Text

Legal Texttext for this modification is being prepared by Northern Gas Networksawaited.

## 7 Recommendation

The proposer recommends that assessment of this modification continues in line with the timetable set by Ofgem when granting urgent status, with a Workgroup Report completed in time for submission to the August Modification Panel.