

0590R

Review the options to remove the use of Fax machines within the UNC

01	Request
02	Workgroup Report

Fax machines are no longer a primary tool for business communication as electronic communications become the default option, so the purpose of this request is to review whether fax should remain the default option for certain processes and their designated code communication requirements.

	The Proposer recommends that this request should be assessed by a Workgroup
	High Impact:
	Medium Impact:
	Low Impact: Shippers and Transporters

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About this document:

This document is a Request, which will be presented by the Proposer to the panel on 21 July 2016.

The Panel will consider the Proposer's recommendation, and agree whether this Request should be referred to a Workgroup for review.

 **Any questions?**

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1 Request

Why is the Request being made?

Business communications have evolved and fax machines are no longer a principle communication solution. Customers challenge the requirement to have fax machines as the code communication mechanism for what they consider to be extremely unlikely event. More innovative solutions are being developed for businesses which are making fax machines redundant and converting fax to desktop solutions.

Scope

The request is to consider whether the requirement/option to use fax as a code communication should remain and whether alternative solutions can be used and what business rules need to be amended/included to accommodate alternative technologies.

Impacts & Costs

The removal of fax as a code communication could reduce the cost burden on parties by no longer requiring the provision of hardware and telephony.

Recommendations

The objective of the request is to consider where fax communication is required within the code, what the impact of alternative solutions could be if fax were removed or whether the use of fax should be optional. The group should consider the rules to be applied to establish communication is effective under the code for the alternative mechanisms proposed.

If the workgroup should consider whether there remains a rationale for fax being retained – and if so in what circumstances and what assurance (if necessary) is required if fax is to be utilised.

The workgroup should consider what evidence is available for to support the retention/removal of fax communication – for example from the emergency exercises carried out annually, what success there is in this type of communication, or the level of communications currently using fax mechanisms or “unapproved” changes have been deployed.

Additional Information

See Appendix 1

2 Impacts and Costs

Consideration of Wider Industry Impacts

Consideration should be given to iGT communications as these may be impacted following the implementation of Modification 0440.

User Pays	
Classification of the modification as User Pays, or not, and the justification for such classification.	No User Pays service would be created or amended by implementation of the recommendations in this report.
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.	N/A
Proposed charge(s) for application of User Pays charges to Shippers.	N/A
Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.	N/A

Impacts

Impact on Transporters' Systems and Process	
Transporters' System/Process	Potential impact
UK Link	<ul style="list-style-type: none"> Documentary changes
Operational Processes	<ul style="list-style-type: none"> Emergency Contacts
User Pays implications	<ul style="list-style-type: none"> None

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	<ul style="list-style-type: none"> Documentary changes
Development, capital and operating costs	<ul style="list-style-type: none">
Contractual risks	<ul style="list-style-type: none">
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> Documentary changes

Impact on Transporters	
Area of Transporters' business	Potential impact

Impact on Transporters	
System operation	<ul style="list-style-type: none"> Potentially impacted?
Development, capital and operating costs	<ul style="list-style-type: none">
Recovery of costs	<ul style="list-style-type: none">
Price regulation	<ul style="list-style-type: none">
Contractual risks	<ul style="list-style-type: none">
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> Documentary changes
Standards of service	<ul style="list-style-type: none"> Documentary changes

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	<ul style="list-style-type: none">
UNC Committees	<ul style="list-style-type: none"> Documentary changes related to Code communications
General administration	<ul style="list-style-type: none">

Impact on Code	
Code section	Potential impact
	<ul style="list-style-type: none"> To be considered

Impact on UNC Related Documents and Other Referenced Documents	
Related Document	Potential impact
Network Entry Agreement (TPD I1.3)	<ul style="list-style-type: none">
Network Exit Agreement (Including Connected System Exit Points) (TPD J1.5.4)	<ul style="list-style-type: none">
Storage Connection Agreement (TPD R1.3.1)	<ul style="list-style-type: none">
UK Link Manual (TPD U1.4)	<ul style="list-style-type: none">
Network Code Operations Reporting Manual (TPD V12)	<ul style="list-style-type: none">
Network Code Validation Rules (TPD V12)	<ul style="list-style-type: none">
ECQ Methodology (TPD V12)	<ul style="list-style-type: none">
Measurement Error Notification Guidelines	<ul style="list-style-type: none">

Impact on UNC Related Documents and Other Referenced Documents	
(TPD V12)	
Energy Balancing Credit Rules (TPD X2.1)	•
Uniform Network Code Standards of Service (Various)	•

Impact on Core Industry Documents and other documents	
Document	Potential impact
Safety Case or other document under Gas Safety (Management) Regulations	• To be considered
Gas Transporter Licence	•

Other Impacts	
Item impacted	Potential impact
Security of Supply	•
Operation of the Total System	•
Industry fragmentation	•
Terminal operators, consumers, connected system operators, suppliers, producers and other non code parties	• To be considered

3 Terms of Reference

Background

Business communications have evolved and fax machines are no longer a principle communication solution. Customers challenge the requirement to have fax machines as the code communication mechanism for what they consider to be extremely unlikely event. More innovative solutions are being developed for businesses which are making fax machines redundant and converting fax to desktop solutions.

Topics for Discussion

- Understanding the objective
- Assessment of alternative means to achieve objective
- Development of Solution (including business rules if appropriate)
- Assessment of potential impacts of the Request
- Assessment of implementation costs of any solution identified during the Request
- Assessment of legal text.

Outputs

Produce a Workgroup Report for submission to the Modification Panel, containing the assessment and recommendations of the Workgroup including a draft modification where appropriate.

Composition of Workgroup

The Workgroup is open to any party that wishes to attend or participate.

A Workgroup meeting will be quorate provided at least two Transporter and two User representatives are present.

Meeting Arrangements

Meetings will be administered by the Joint Office and conducted in accordance with the Code Administration Code of Practice.

4 Recommendation

The Proposer invites the Panel to:

- DETERMINE that Request 0590R progress to Workgroup for review.

5 Appendix 1

References to Facsimile within Code and related documents

UNC TPD Sections:

Section G: 1.20 Reduction of Offtake at Firm Supply Points

- 1.20.3 For the purposes of paragraph 1.20.1 the User will give the relevant information to the Transporter by means of telephone or facsimile, unless it has given to the Transporter not less than one month's notice of its intention to give such information by Batch Transfer Communication, in which case such User will give information to the Transporter for the purposes of paragraph 1.20.1 only by Batch Transfer Communication, and will promptly inform the Transporter by telephone or facsimile of the transmission of each such Batch Transfer Communication.
- 1.20.4 Where the Transporter notifies a User that it is unable satisfactorily to access a Batch Transfer Communication transmitted pursuant to paragraph 1.20.3, that User will promptly send to the Transporter by facsimile the information contained in that Batch Transfer Communication

Section G5: DM Supply Point Capacity & Offtake Rate

- 5.1.12 Requests for information by the Transporter in accordance with paragraph 5.1.9 and provision of information by the Registered User in accordance with paragraph 5.1.4(e), (f) and (g) and paragraph 5.1.9(a) and (b) shall be communicated by facsimile or email

Section G6.6: Requirements as to Interruptible Supply Points

- 6.6.3 Where a User is or is to become the Registered User of one or more Interruptible Supply Points the User shall:
- (a) not later than the relevant date (in accordance with paragraph 6.6.6) in respect of the first Interruptible Supply Point of which it becomes Registered User, provide to the DN Operator at least one telephone number and at least one (1) facsimile number (but not more than four (4) numbers in total) by means of which the DN Operator may contact, twenty-four (24) hours a Day, a representative of the User, and the name(s) or title(s) of not more than three (3) representatives of the User who may be contacted at such numbers;
 - (c) secure that at all times on each Day one of such representatives is available and capable of being so contacted by telephone (with access to facsimile) or by facsimile.
- 6.6.4 A User shall, in relation to each Interruptible Supply Point of which it is or is to become the Registered User:
- (a)
 - (iii) one (1) facsimile number, for the purposes of receiving communications pursuant to Section G and Section Q, which is able to receive transmissions twenty-four (24) hours a day;
 - (c) take all reasonable steps to secure that at all times on each Day one of such representatives is available and capable of being so contacted by telephone (with access to facsimile) and by facsimile;
- 6.6.10 For the purposes of paragraph 6.6.8 the User will give the relevant information to the DN Operator by means of telephone or facsimile, unless it has given to the DN Operator not less than one month's notice of its intention to give such information by Batch Transfer Communication, in which case such User will give information to the DN Operator for the

purposes of paragraph 6.6.8 only by Batch Transfer Communication, and will promptly inform the DN Operator by telephone or facsimile of the transmission of each such Batch Transfer Communication.

- 6.6.11 Where the DN Operator notifies a User that it is unable satisfactorily to access a Batch Transfer Communication transmitted pursuant to paragraph 6.6.10, that User will promptly send to the DN Operator by facsimile the information contained in that Batch Transfer Communication.
- 6.8.2 The User may request by telephone or facsimile an alteration to the Supply Points and Interruptible Tranches specified in the Interruption Notice; and where not less than five (5) hours before the Interruption Start Time the DN Operator and the User have agreed (but so that the DN Operator shall not be required to agree) upon such an alteration, the Interruption Notice will be revised accordingly and resubmitted by the DN Operator to the User as soon as reasonably practicable.
- 6.8.3 The User shall, by telephone or facsimile (or otherwise in accordance with this paragraph 6.8):

Annex G-2 4 Miscellaneous

- 4.5 (a) Any notice to be given under this Agreement shall be in writing and shall be duly given if signed by or on behalf of a person duly authorised to do so by the person giving the notice and delivered by hand at, or by sending it by first class post or by facsimile transmission to the relevant address, or facsimile number set out in Part 1 of the Schedule hereto in the case of the Shippers, and Part 2 of the Schedule hereto, in the case of the Consumer.
- 4.5 (c) Any such notice given as aforesaid shall be deemed to have been given or received:
- (i) if sent by hand, at the time of delivery;
 - (ii) if sent by facsimile, upon transmission acknowledged by a correct transmission slip at the end of the message; and

Section Q Emergencies: 2.2 User emergency contacts

- 2.2.1 Each User shall provide to the Transporter:
- (a) a single telephone number and a single facsimile number by means of each of which the Transporter may contact, 24 hours a Day, a representative of the User in a Gas Supply Emergency for any purpose pursuant to this Section Q
- 2.3.1 A User shall in respect of each Large Firm Supply Point of which it is the Registered User provide to the Transporter:
- (c) in the case of a Large Firm Supply Point the Annual Quantity of which is greater than 1,464,000 kWh (50,000 therms), one facsimile number, for the purposes of receiving communications pursuant to this Section Q, which is able to receive transmissions 24 hours a day
- 2.4.1 A User shall in respect of each Interruptible Supply Point of which it is the Registered User provide to the Transporter:
- (d) one facsimile number, for the purposes of receiving communications pursuant to Section G and Section Q, which is able to receive transmissions 24 hours a day

Section S:

- 3.4.5 Where the Invoice Document number is not quoted (in accordance with paragraph 3.4.4) with any remittance made by or on behalf of a User, and no Invoice Remittance Advice corresponding to the remittance is submitted, the Transporter will endeavour to obtain the User's instructions (by telephone, facsimile or e-mail) as to the application thereof; but if it

has not (by the Business Day following the Day of the remittance) obtained such instructions, the Transporter will apply the amount remitted to or towards Invoice Amount(s) in order of Invoice Due Date (the earliest first) and proportionately as between Invoice Amounts with the same Invoice Due Date, but applying such amount last to any Invoice Amounts which are subject to an Invoice Query.

Section U- UK Link: 1.2 Code Communications

- 1.2.2 The UK Link Manual specifies in respect of each Code Communication therein listed whether it is to be given as a UK Link Communication, by Conventional Notice, by e-mail, by facsimile or by telephone, and in some cases alternative such means by which it may be given; and (subject to paragraph 1.2.4 and GT Section B5.1.2) a Code Communication may only be given by the means so specified or (where alternative such means are specified) by one of such alternative means.
- 1.8.2 If a UK Link User becomes aware that (notwithstanding paragraph 1.8.1) any unauthorised access to or use of UK Link has or may have occurred, it shall promptly by telephone or facsimile so notify the Transporters and take such other steps as may be required under the UK Link Manual.
- 1.8.3 If a Transporter becomes aware that (notwithstanding paragraph 1.8.1) any unauthorised access to or use of UK Link has or may have occurred, it shall promptly by telephone or facsimile so notify any UK Link User who may be affected thereby (a User being so affected where a UK Link Communication given by or to such UK Link User may have been affected thereby, or where there may have been unauthorised access to information relating to such UK Link User), and take such other steps as may be required under the UK Link Manual.
- 2.7.2 The Transporters will notify a UK Link User by telephone (followed by facsimile) of any steps under paragraph 2.7.1 wherever practicable before and in any event as soon as practicable after taking such steps; and will restore the UK Link User's access to UK Link promptly upon the UK Link User demonstrating to the Transporters' reasonable satisfaction that the non-compliance referred to in paragraph 2.7.1(c) will not recur.
- 4.5.9 In the circumstances in paragraph 4.5.8:
- (a) the sender of the Batch Transfer Communication shall, as soon as it becomes aware that no acknowledging message was received, endeavour to contact (by telephone or facsimile) and so notify the intended recipient of that Batch Transfer Communication;
 - (b) following such notification the sender and the intended recipient shall immediately take all reasonable steps (other than steps involving the investigation of equipment installed at the other's premises) to identify the cause of the recipient's non-receipt of an acknowledging message, and if either of them shall so identify such cause it shall promptly so inform the other (by telephone or facsimile);

Section V: 2 User Admission

- 2.1.2 The requirements referred to in paragraph 2.1.1(a) are as follows:
- (a)
 - (iii) the postal and e-mail address and telephone and facsimile numbers of the Applicant User, and the individual for whose attention notice is to be marked, for the purposes of notice under GT Section B5.2.3 and B5.3.1;
- 3.4.7 Each User shall provide to the Transporter:
- (a) a single telephone number, a single address, a single e-mail address and a single facsimile number by means of which the Transporter may contact a representative of the User for any purpose pursuant to Transportation Charges in connection with Section V3 and/or V4; and

Section X Energy Balancing and Credit Management

- 2.7.2 Where a User gives a notification under paragraph 2.7.1:
- (c) if requested by National Grid NTS the User shall provide by telephone or facsimile any further details or explanation of its view.
- 2.7.9 A notification under paragraph 2.7.1 or notice under 2.7.5 shall be given:
- (a) by facsimile; or
 - (b) by telephone confirmed by facsimile given not later than 17:00 hours on the same Day
- 2.10.4 Where a User gives a notification under paragraph 2.10.3:
- (c) if requested by National Grid NTS the User shall provide by telephone or facsimile any further details or explanation of its view.

UNC General

General Terms B5: Notices & Communications

5.1 General

- 5.1.6 Paragraph 5.1.5 does not apply in respect of:
- (a)
 - (iii) any other communication to be made by UK Link Communication or by telephone or by facsimile where the context requires that such communication be treated as received within the Day on which it is given; and

5.2 Notices by delivery, post, email or facsimile

- 5.2.2 Any notice shall be in writing and shall be addressed to the recipient Party at the recipient Party's address, facsimile number or e-mail address referred to in paragraph 5.2.3, and marked for the attention of the representative (identified by name or title) referred to in that paragraph, or to such other address or facsimile number or e-mail address and/or marked for the attention of such other representative as the recipient Party may from time to time specify by notice given in accordance with this paragraph 5.2 to the Party giving the notice.
- 5.2.3 The initial address, facsimile number, or e-mail address of a Party, and representative for whose attention notices are to be marked, shall be as specified by a User pursuant to TPD Section V2.1.2(a)(iii) or by the Transporter pursuant to TPD Section V2.2.2(a)(i)
- 5.2.5 Any notice shall be deemed to have been received:
- (c) in the case of facsimile, on acknowledgement by the recipient Party's facsimile receiving equipment; or
- 5.2.6 Where a notice is sent by facsimile:
- (a) the Party giving the notice shall (but without prejudice to paragraph 5.2.5(c)) if requested by the recipient Party, resend as soon as reasonably practicable the notice by facsimile; and
 - (b) in the case of a Termination Notice, the Transporter will in any event, within 2 Days following the sending of such facsimile, send to the recipient Party a copy of the notice by first class prepaid post (airmail if overseas).

- 5.2.7 A Party may specify different addresses or facsimile numbers and representatives pursuant to paragraph 5.2.2 for the purposes of notices of different kinds or relating to different matters.

Offtake Arrangements Document

Section N4: Admission

4.2.2 The requirements referred to in paragraph 4.2.1(a) are as follows:

- (a) the New DNO shall have applied to National Grid NTS, in such form as the Offtake Committee may from time to time prescribe, giving the following details:
 - (iii) the address, telephone and facsimile numbers of the New DNO, and the individual for whose attention notice is to be marked, for the purposes of notice under GT Section B5.2.3; and

Energy Balancing Credit Rules

3.3 Appeals

3.3B Valid Appeal Process:

Where a valid appeal is received by the deadline the Cash Call is suspended pending validation. The appeal data is reviewed and the User's indebtedness recalculated.

Where a User gives a notification under paragraph 2.7.1:

- a) the relevant Cash Call (and the obligation of the User to make payment thereof) will be suspended, subject to paragraph 2.7.3;
- b) National Grid NTS will review the details provided by the User and will review the calculations made of the User's Outstanding Relevant Balancing Indebtedness;
- c) if requested by National Grid NTS the User shall provide by telephone or facsimile any further details or explanation of its view