

## Stage 01: Modification

# 0507:

## Changing The Effective Date of 0451AV

At what stage is this document in the process?

- 01 Modification
- 02 Workgroup Report
- 03 Draft Modification Report
- 04 Final Modification Report

*This modification seeks to amend the reconciliation effective date of 0451AV to 1<sup>st</sup> October 2014*



The Proposer recommends that this modification should:

- proceed to Consultation



High Impact:  
Shippers



Medium Impact:



Low Impact:

0507

Modification

04 July 2014

Version 2.0

Page 1 of 8

© 2014 all rights reserved

## Contents

- 1 Summary
- 2 Why Change?
- 3 Solution
- 4 Relevant Objectives
- 5 Implementation
- 6 Legal Text
- 7 Recommendation

## About this document:

This modification will be presented by the proposer to the panel on 17<sup>th</sup> July 2014.

The panel will consider the proposer's recommendation and agree whether this modification should be:

- issued for consultation.



3 Any questions?

5 Contact:  
6 Code Administrator



7 enquiries@gasgo  
8 vernance.co.uk



8 0121 288 2107

8 Proposer:  
Huw Comerford



huwcomerford@google  
8 email.com



01962 891 150

Transporter:  
National Grid  
Distribution



chris.warner@national  
grid.com

Systems Provider:  
Xoserve



[commercial.enquiries  
@xoserve.com](mailto:commercial.enquiries@xoserve.com)

0507

Modification

04 July 2014

Version 2.0

Page 2 of 8

© 2014 all rights reserved

# 1 Summary

## Is this a Self-Governance Modification?

As this modification is seeking to change the current effective date of 0451AV 1<sup>st</sup> February 2014 to the 1<sup>st</sup> October 2014, we don't believe this would be a self-governance modification as it would change the date of the commencement of reconciliation to the pre-payment profile under modification 0451AV.

## Is this a Fast Track Self-Governance Modification?

We don't believe this modification would fit the criteria for self-governance so would not be eligible to be fast tracked.

## Why Change?

When Ofgem approved Modification 0451AV, they rejected 0451V due to the retrospective element within it. However, by directing implementation of 0451AV to be the 1<sup>st</sup> February 2014, with neither the pre-payment profile to be used nor the solution to be developed by Xoserve ready, Ofgem have added an element of retrospection.

Xoserve believe that the solution will not be ready until October 2014 and there is currently no solution date from DESC for the pre-payment profile. This will mean that when Xoserve do implement the solution they will be performing a reconciliation back dated to the 1<sup>st</sup> February implementation date, which if the solution is delivered in October 2014, will mean that shippers will face an invoice for an 8 month period. Due to the fact that the pre-payment profile has not yet been developed this will mean shippers will have no way of predicting the value of this invoice and as such will create considerable uncertainty within the market place for shippers who operate within the pre-payment market. This along with retrospection is something that Ofgem have always sought to avoid and has been used as a reason for rejecting modifications previously. An example of this was modification 0456 which sought to bring forward a more accurate AUGE methodology but was rejected by Ofgem due to the market uncertainty it could bring despite recognising it to be a more accurate method for allocating un-identified gas.

## Solution

It is proposed that the reconciliation effective date of modification is changed to the 1<sup>st</sup> October 2014, providing the pre-payment profile has been developed and the industry has had chance to review it to ensure it is fit for purpose. Our reasoning for choosing this date is that this is the date which Xoserve currently believe the solution for 0451AV would be ready. It would also align with the start of the new gas year and therefore would ensure that the change effects a full gas year and as such allows for volume to be more accurately apportioned throughout the gas year rather than the current proposal which is being brought in mid-year and won't ensure the equitable allocation of gas for the full gas year. It would also ensure that DESC would have had plenty of time to develop the pre-payment profile required. If once the profile has been published by DESC any shipper raises concerns with DESC over the profile, then reconciliation would not be able to commence until those concerns have been satisfactorily addressed by DESC. If either the Authority decision, pre-payment profile or Xoserve solution is not delivered by the 1<sup>st</sup> January 2015 then there should be no reconciliation under 0451AV. The reason for this is that 0451AV was originally raised to balance out the apportionment of gas over the winter and summer periods for pre-payment meters. Commencing reconciliations after 1<sup>st</sup> January 2015 would mean that the re-apportionment wouldn't be over a whole gas year and therefore would not fulfil the intent of 0451AV. This would also be in line with Ofgem's decision on iGT054 where they stated that "Given that any relative over or under allocation of gas during the winter or summer months is netted off over the course of a year, we do not consider that it would be appropriate to allow for an alternative profile to be used for less than a

0507  
Modification

04 July 2014

Version 2.0

Page 3 of 8

© 2014 all rights reserved

whole year". Also with the UK Link Replacement due to commence 1<sup>st</sup> October 2015, 0451AV would not remain cost effective.

## Relevant Objectives

We believe this this modification would have a positive impact on relevant objective D, as by removing the current uncertainty that shippers are facing receiving an invoice they have no way of accurately predicting will remove the negative impact the current reconciliation effective date would have on competition. Also an October start date would allow more accurate financial planning for shippers as it will have removed the uncertainty that the market currently faces.

## Implementation

There would be no costs for implementation as this would only be changing the effective date of 0451AV. There could be a reduction of costs of 0451AV as the Transporters would not have to perform a retrospective reconciliation to the implementation date of February 2014.

Implementation 01 October 2014 if a decision is made by 30 September 2014;

Implementation 01 November 2014 if a decision is made by 31 October 2014.

The backstop lead time is the 1<sup>st</sup> Working Day 30 days following the Ofgem decision.

For clarity if under any of the above proposed implementations a shipper has raised a concern with DESC regarding the pre-payment profile then there will be no reconciliation until the query has been satisfactorily resolved by DESC.

0507

Modification

04 July 2014

Version 2.0

Page 4 of 8

© 2014 all rights reserved

## 2 Why Change?

When Ofgem approved modification 0451AV, they rejected 0451V due to the retrospective element within it. However by directing implementation of 0451AV to be the 1<sup>st</sup> February 2014, with neither the pre-payment profile to be used nor the solution to be developed by Xoserve ready, Ofgem have added an element of retrospection.

Xoserve believe that the solution will not be ready until October 2014 and there is currently no solution date from DESC for the pre-payment profile. This will mean that when Xoserve do implement the solution they will be performing a reconciliation back dated to the 1<sup>st</sup> February implementation date, which if the solution is delivered in October 2014, will mean that shippers will face an invoice for an 8 month period. Due to the fact that the pre-payment profile has not yet been developed this will mean shippers will have no way of predicting the value of this invoice and as such will create considerable uncertainty within the market place for shippers who operate within the pre-payment market. This along with retrospection is something that Ofgem have always sought to avoid and has been used as a reason for rejecting modifications previously. An example of this was modification 0456 which sought to bring forward a more accurate AUGE methodology but was rejected by Ofgem due to the market uncertainty it could bring despite recognising it to be a more accurate method for allocating un-identified gas.

### 3 Solution

It is proposed that the reconciliation effective date of modification is changed to the 1<sup>st</sup> October 2014, providing the pre-payment profile has been developed and the industry has had chance to review it to ensure it is fit for purpose. Our reasoning for choosing this date is that this is the date which Xoserve currently believe the solution for 0451AV would be ready. It would also align with the start of the new gas year and therefore would ensure that the change effects a full gas year and as such allows for volume to be more accurately apportioned throughout the gas year rather than the current proposal which is being brought in mid-year and won't ensure the equitable allocation of gas for the full gas year. It would also ensure that DESC would have had plenty of time to develop the pre-payment profile required. . If once the profile has been published by DESC any shipper raises concerns with DESC over the profile, then reconciliation would not be able to commence until those concerns have been satisfactorily addressed by DESC. If either the Authority decision, pre-payment profile or Xoserve solution is not delivered by the 1<sup>st</sup> January 2015 then there should be no reconciliation under 0451AV. The reason for this is that 0451AV was originally raised to balance out the apportionment of gas over the winter and summer periods for pre-payment meters. Commencing reconciliations after 1<sup>st</sup> January 2015 would mean that the re-apportionment wouldn't be over a whole gas year and therefore would not fulfil the intent of 0451AV. This would also be in line with Ofgem's decision on iGT054 where they stated that "Given that any relative over or under allocation of gas during the winter or summer months is netted off over the course of a year, we do not consider that it would be appropriate to allow for an alternative profile to be used for less than a whole year". Also with the UK Link Replacement due to commence 1st October 2015, 0451AV would not remain cost effective.

#### User Pays

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

Whilst there is an amendment to a user pays modification, it is only a change to the effective date and therefore there would be no User Pays costs associated with it.

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

0507

Modification

04 July 2014

Version 2.0

Page 6 of 8

© 2014 all rights reserved

## 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<br>(i) the combined pipe-line system, and/ or<br>(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:<br>(i) between relevant shippers;<br>(ii) between relevant suppliers; and/or<br>(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              |

We believe this this modification would have a positive impact on relevant objective D, as by removing the current uncertainty that shippers are facing receiving an invoice they have no way of accurately predicting will remove the negative impact the current implementation date would have on competition. Also a October start date would allow more accurate financial planning for shippers as it will of removed the uncertainty that the currently implementation date brings.

## 5 Implementation

If the prepayment profile and Xoserve solution is ready by the 1<sup>st</sup> September and an Authority decision is made by the 30<sup>th</sup> September 2014 then implementation should be 1<sup>st</sup> October. We have given such a short lead time because Xoserve have already indicated that the with the current implementation date they would be doing the first reconciliation in October and therefore if the decision is made by 30<sup>th</sup> September this just changes the number of months for which they need to perform the reconciliation.. By not commencing any reconciliation until after the pre-payment profile and Xoserve solution are ready would ensure that there would be no retrospective element to 0451AV.

If the prepayment profile and Xoserve solution is ready by the 1<sup>st</sup> October and an authority decision is made after the 30<sup>th</sup> September and by the 31<sup>st</sup> October 2014 then the implementation date should be 1<sup>st</sup> November. If an Authority decision is made after the 31<sup>st</sup> October 2014 then implementation would be the on the 1<sup>st</sup> working day of the month following the decision, providing the pre-payment profile has been published. If the pre-payment profile has not been published for 1 month, then the implementation date would be the 1<sup>st</sup> working day 1 month after the pre-payment profile has been published.

For clarity if under any of the above proposed implementations a shipper has raised a concern with DESC regarding the pre-payment profile then there will be no reconciliation until the query has been satisfactorily resolved by DESC.

If the either the Authority decision, Xoserve solution or the publication of the pre-payment profile is after the 1<sup>st</sup> January 2015 then there should be no reconciliation under 0451AV. The reasons for this is that 0451AV was originally raised to balance out the apportionment of gas over the winter and summer periods for pre-payment meters. Commencing the reconciliations after 1<sup>st</sup> January 2015 would mean that the re-apportionment wouldn't be over a whole gas year and therefore would not fulfil the intent of 0451AV. Also with the UK Link Replacement due to commence 1<sup>st</sup> October 2015, 0451AV would not remain cost effective.

## 6 Legal Text

To be provided

## 7 Recommendation

We believe that because there would only be a change of the effective date of 0451AV then there would not be a need for workgroup development and therefore should be sent straight to consultation.

The Proposer invites the Panel to:

- Determine that this modification should not be subject to self-governance; and
- Progress to Consultation.

0507

Modification

04 July 2014

Version 2.0

Page 8 of 8

© 2014 all rights reserved