Shippers and Transporters

UNC Final Modification Report UNC 0637S: 01 Modification 02 Workgroup Report Amending the permissions to **Draft Modification** release data to Meter Asset Provider organisations **Purpose of Modification:** This modification seeks to amend the existing permissions for Supply Point data to be provided to Meter Asset Provider (MAP) organisations. The Panel determined that this self-governance modification be implemented. High Impact: None Medium Impact: None Low Impact:

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1 Summary

What

Currently the Uniform Network Code (UNC) permits the release of certain data items to Meter Asset Provider (MAP) organisations if they provide the Meter Point Reference Number (MPRN), Meter Serial Number (MSN) and meter model upon submission of a request for information - the 'Meter Point Request Information'. Currently Supply Point information shall only be provided where the Meter Point Request Information matches the records on the Supply Point Register held centrally.

Why

The provision of this service to MAP organisations supports the resolution of data discrepancies between industry parties especially in circumstances where MAP organisations are unable to obtain the data from industry data flows to operate their business efficiently.

MAP organisations confirmed this service has been beneficial; however, concerns with the meter model as a required data item have been raised. This stems from issues MAP organisations have encountered regarding the meter model held centrally (provided by the Meter Asset Manager - MAM), differing from the meter model they hold. Subsequently, where the meter model is not provided by the MAP organisation or does not match that held centrally, the enquiry will be rejected despite the MPRN and MSN being a match.

By removing the meter model as a requirement (for meters with a capacity up to and including 11m³), the service will be extended (capturing those enquiries failing validation) and greater volumes of data will be available. This is likely to increase the resolution of data discrepancies between industry parties and assist with the data cleansing.

How

This modification seeks to amend the Meter Point Request Information that MAP organisations are required to provide in order to receive Supply Point data. The amendment intends to remove the 'meter model' data item from the required Meter Point Request Information for meters with a capacity up to and including 11m³. For meters with a capacity above 11m³ the existing requirements will endure – meter model will be required.

The solution is an amendment to UNC TPD Section V5 (Information and Confidentiality), to confirm the meter model data item will only be required as Meter Point Request Information to obtain Supply Point data for meters with a capacity of above 11m³ only. The equivalent amendment to Annex V-9 will also be required to stipulate this requirement.

2 Governance

Justification for Self-Governance

This modification seeks to amend the existing requirements for a MAP organisation to receive Supply Point data. It is an amendment only to legal text in Section V5 of UNC TPD to make meter model as a Meter Point Request Information data item a requirement only for meters with a capacity above 11m³.

As this amendment is simply looking to extend the existing services to MAP organisations and prevent the meter model data item impeding the data which can be cleansed, it unlikely to have a material impact on competition between Shippers and/or Suppliers.

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There is no impact on any of the other Self-Governance criteria.

As such, this is a non-material change to the UNC to amend the existing permissions for MAP organisations to obtain Supply Point data.

Requested Next Steps

This modification should:

- be considered a non-material change and subject to self-governance
- proceed to consultation

3 Why Change?

Modification 0422 - *Creating the permission to release data to Meter Asset Provider organisations* was implemented on 01 April 2013. This created the permissions in UNC to release certain data items to MAP organisations if they provided the Meter Point Request Information (MPRN, MSN, meter model) and this matches that held on the Supply Point Register.

As these permissions already exist, this modification seeks to remove the meter model data item as a requirement for MAP organisations to obtain Supply Point data for meters with a capacity up to and including 11m³. For meters with a capacity above 11m³, they will be treated differently as the existing permissions will endure – meter model matching will need to be provided with the other Meter Point Request Information (MPRN and MSN) and match the records held on the Supply Point Register in order to receive the information.

The provision of this service to MAP organisations supports the resolution of data discrepancies between industry parties. Where MAP organisations are unable to obtain the data from industry data flows to operate their business efficiently, they will use the service provided by the CDSP and request the information.

Feedback from MAP organisations confirmed this service has been beneficial; however, concerns with the meter model as a required data item have been raised. Currently, around 10-15% of enquires from MAP organisations fail to receive the service due to the meter model provided, not matching what is held on the Supply Point Register.

MAP organisations have advised that the meter models held at industry level can be different to the meter model codes they hold internally, which provide specificity in relation to individual meter functionality. In some cases, this results in the true meter model code not being present within MDD and unable to be input due to the restricted dataset. As MAM organisations submit the meter model details (via their Supplier and Shipper) to be held centrally, in the absence of data within industry data flows, MAP organisations may not have visibility of the meter model held. This impedes the provision of the service even in cases where both the MPRN and MSN match the data held on the Supply Point Register.

By removing the meter model matching as a requirement (for meters with a capacity up to and including 11m³), the service will be extended (capturing the 10-15% failing validation) and greater volumes of data will be available. This is likely to increase the resolution of data discrepancies between industry parties and assist with the data cleansing.

Modification 0422 has been working successfully and the industry has not been made aware of any negative impacts. This amendment simply looks to make improvements by extending the existing services with the intention to improve data accuracy.

4 Code Specific Matters

Reference Documents

Modification 0422 - Creating the permission to release data to Meter Asset Provider organisations

Knowledge/Skills

No knowledge or skills are necessary

5 Solution

TPD Section V5 (Information and Confidentiality) of the UNC is amended to make the meter model data item a requirement to obtain Supply Point data for meters with a capacity of above 11m³ only.

For meters with a capacity up to and including 11m³, the meter model data item will no longer be a requirement.

This amendment means that MAP organisations will be required to provide the MPRN and MSN which matches that held on the Supply Point Register in order to receive Supply Point data.

There will be no obligation on the MAP organisations to amend the way the required Meter Point Request Information is submitted. It will be the CDSP validation rules which will check from the data provided if the MPRN and MSN match that held on the Supply Point Register and whether the meter capacity is up to and included 11m³. If the checks show the meter capacity is above 11m³, and the meter model has not been provided, the data will be excluded from the service.

The MAP organisations will still be required to enter into the confidentiality agreement with the Transporters to obtain access rights to the data, and a contract with the CDSP for the provision of the service. Only MAP organisations registered on SPAA records will be permitted to request the information.

6 Impacts & Other Considerations

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

Neither the SCR nor any significant industry change project in impacted.

Consumer Impacts

This change will improve competition between Shippers/Suppliers by the provision of timely data to the MAP organisation as it will reduce, in some circumstances, unknown or potentially misallocated costs being incurred by Suppliers. This can occur when the MAP organisation loses visibility of an asset due to a Change of Supplier/Shipper event and in the absence of required data from industry data flows. Improved efficiency of meter provision arrangements should lead to lower overall metering costs. Whilst not directly benefitting Consumers, this modification will improve the efficiency of the operation of the wider gas industry and reducing industry costs.

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Cross Code Impacts

No cross code impacts have been identified. However, there may be a consequential impact on iGT UNC should references used in UNC change.

EU Code Impacts

No EU Code impacts identified

Central Systems Impacts

No impact to Central Systems.

7 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 identified				
O) Coordinated, efficient and economic operation of None identified					
(i) the combined pipe-line system, and/ or					
(ii) the pipe-line system of one or more other relevant gas transporters.					
c) Efficient discharge of the licensee's obligations.	None identified				
d) Securing of effective competition:	Potential impact				
(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.					
e) Provision of reasonable economic incentives for relevant suppliers to	None identified				
secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers.					
f) Promotion of efficiency in the implementation and administration of the Code.	None identified				
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 identified				

d) Securing of effective competition

This change will improve competition between Shippers/Suppliers by the provision of timely data to the MAP organisation as it will reduce, in some circumstances, unknown or potentially misallocated costs being incurred by Suppliers. Improved efficiency of meter provision arrangements should lead to lower overall metering costs. Whilst not directly benefitting UNC parties this modification will improve the efficiency of the operation of the wider gas industry, reducing industry costs and improving services.

8 Implementation

As self-governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

9 Legal Text

Text Commentary

MODIFICATION 0637 - LEGAL TEXT - EXPLANATORY TABLE

AMENDING THE PERMISSIONS TO RELEASE DATA TO METER ASSET PROVIDER ORGANISATIONS

TRANSPORTATION PRINCIPAL DOCUMENT SECTION V - GENERAL	Topic	BRDs	Explanation
Amendment to paragraph 5.16.2	Disclosure of Meter Asset Provider information	-	The proposed amendment to paragraph 5.16.2 (c) means that, in order to obtain Meter Point Information, the Meter Asset Providers only need to provide meter information at the point of request in addition to the Meter Point Reference Number and Meter Serial Number where the capacity of the meter is in excess of 11m ³ .
Amendment to Annex V-9	Disclosure of Meter Asset Provider information	-	The proposed amendment to Annex V-9 specifically cross references paragraph 15.6.2 so that it is clear that the Meter Asset Provider only needs to provide the information detailed in 15.6.2 at the point of request, which specifically states that meter information is only required where the capacity of the meter is in excess of 11m ³ .

Legal Text

UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT SECTION V - GENERAL

Amend paragraph 5.16.2 as follows:

5.16 Disclosure of MAP Information (Annex V-9)

- 5.16.2 For the purposes of this paragraph 5.16, "Meter Point Request Information" shall include the following information in respect of each Supply Meter Point:
 - (a) meter point reference number;
 - (b) meter serial number; and
 - (c) meter model where the meter capacity is above 11m³.

Amend Annex V-9 so that the line underneath the table reads: * - fields to be provided by the requesting Meter Asset Provider at the time of request in accordance with paragraph 5.16.2.

10 Consultation

Panel invited representations from interested parties on 19 October 2017. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Implementation was unanimously supported in the 5 representations received.

Representations were received from the following parties:			
Organisation	Response	Relevant Objectives	Key Points
Cadent	Support	d) - Positive	Considers that the modification should improve the process for the 10-15% data requests which currently fail validation.
			• Understands that the data requests are failing, not due to 'incorrect' meter model information being provided but for reason of different parties utilising varying naming conventions for the same meter model.
			Is of the opinion that providing just the MPRN and meter serial number should be sufficient to demonstrate an entitlement to the requested data.
			Supports self-governance status.
			Supports immediate implementation.
E.ON	Support	d) - Positive	Considers that this modification should improve the returned matches and improve data quality to facilitate a reduction in queries due to inability to match data.
			Supports self-governance status.
			Supports immediate implementation.
			Anticipates looking at the iGT UNC implications with a

			view to possibly raising a modification should this be necessary.
Engie	Support	d) - Positive	Agrees that the modification aims to make the existing process of releasing data to the Meter Asset Provider more efficient thereby facilitating an improvement in data quality.
			 Notes that whilst reducing the number of fields necessary to validate a request may lead to an increase in erroneous requests the probability of this seems low, compared with the probability of a valid request being rejected under the current process. (10-15%).
			 Notes that as the existing measures to protect the inappropriate use of this data remain unchanged, any increase in erroneous requests should not have a wider impact on the industry.
			Supports implementation as soon as possible.
Macquarie Energy Leasing	Support	d) - Positive	Supports the rationale that by removing the meter model as a requirement (for meters with a capacity up to and including 11m3), should increase the resolution of data discrepancies between industry parties and assist with data cleansing
			There will be no implementation costs for MAPs as they will continue to submit data requests.
			This is likely to reduce the cost of processing exceptions at MAPs, Suppliers and other interested parties and will improve accuracy of billing for MAP services.
Wales & West Utilities	Support	d) - Positive	Supports this modification on the grounds that the relaxation in the criteria for releasing information for domestic MAPs should improve data consistency and help resolve discrepancies between parties.
			Considers that this will reduce risk for Meter Asset Providers thereby increasing competition in the domestic metering market and hence competition between domestic Suppliers.
			Whilst supporting self-governance, considers that the modification should improve competition between Suppliers, however, this should not be material, as the largest impact will be on Meter Asset Providers.

Please note that late submitted representations will 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

Discussion

The Panel Chair summarised that Modification 0637S would amend the existing permissions for Supply Point data to be provided to Meter Asset Provider (MAP) organisations, which is likely to increase the resolution of data discrepancies between industry parties and assist with the data cleansing.

Some panel members believed that there remain underlying data quality issues which warrant consideration.

Members considered the representations made noting that implementation was unanimously supported in the 5 representations received.

Members agreed with respondents that this modification is likely to improve data quality on the grounds that the relaxation in the criteria for releasing information for domestic MAPs should help resolve discrepancies between parties.

That this modification is likely to reduce the cost of processing exceptions at MAPs, Suppliers and other interested parties and should improve accuracy of billing for MAP services.

Members noted that the existing measures to protect the inappropriate use of this data remain unchanged and any increase in erroneous requests should not have a wider impact on the industry.

Consideration of the Relevant Objectives

Members considered relevant objective d) Securing of effective competition between Shippers and/or Suppliers, agreeing that implementation would have a positive impact because this modification should improve competition between Shippers/Suppliers by the provision of timely data to the MAP organisation and by reducing unknown or potentially misallocated costs being incurred by Suppliers. Improved efficiency of meter provision arrangements should lead to lower overall metering costs. Whilst not directly benefitting UNC parties this modification should improve the efficiency of the operation of the wider gas industry, reducing industry costs and improving services and furthering competition.

Determinations

Members voted unanimously to implement Modification 0637S

Members voted with 13 votes in favour (out of a possible 13), to implement Modification 0637S.

12 Recommendations

Panel Determination

Members agreed that Modification 0637S should be implemented.