### **UNC Modification**

At what stage is this document in the process?

# UNC 0641S:

Amendments to Modification 0431 - Shipper/Transporter - Meter Point Portfolio Reconciliation rules and obligations

01 Modification

02 Workgroup Report

03 Draft Modification Report

04 Final Modification Report

### **Purpose of Modification:**

This proposal seeks to amend the rules to extend the portfolio reconciliation notice period as and when an Industry industry reconciliation exercise is deemed necessary.

The Proposer recommends that this modification should be:



- subject to self-governance
- assessed by a Workgroup

This modification will be presented by the Proposer to the Panel on 21 December 2017. The Panel will consider the Proposer's recommendation and determine the appropriate route.



Low Impact:

The proposer believes there will be a low impact to shippers, Suppliers, GDN Transporters and the Central Data Service Provider (CDSP).

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# **Timetable**

**Legal Text** 

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### The Proposer recommends the following timetable:

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Initial consideration by Panel	21 December 2017
Workgroup consider amended Modification	22 March 2018
Workgroup Report presented to Panel	18 January 19 April 2018
Draft Modification Report issued for consultation	18 January 19 April 2018
Consultation Close-out for representations	<del>07 February</del> 11 May 2018
Final Modification Report available for Panel	<del>12 February</del> 14 May 2018
Modification Panel decision	15 February 17 May 2018 (considered at short notice)



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### 1 Summary

#### What

Given the volume of work required <u>by shippers/suppliers</u> to <u>completerespond to</u> a <u>notice to undertake a meter point portfolio</u> reconciliation <u>exercise</u>, the <u>current</u> notice period of 20 <u>daysBusiness Days</u>, <u>introduced by Modification Proposal 0431</u> is too short.

### Why

We also believe shippers and their relevant suppliers require and will benefit from a longer notice period, enabling them to make appropriate arrangements to ensure there is adequate budget, resourcing and training to undertake the reconciliation exercise successfully.

#### How

We suggest that legal text reconciliation exercise notice period is extended from 20 days <u>Business Days</u> to a minimum of <u>90 days 60 Business Days</u>.

### 2 Governance

#### **Justification for Self-Governance**

The proposer believes this modification does not have a likely material impact to any party, therefore the change can proceed under the self-governance arrangements.

### **Requested Next Steps**

This modification should:

- be considered a non-material change and subject to self-governance
- be assessed by a Workgroup.

The proposer would welcome the opportunity to take this proposal to Workgroup for development to discuss if the proposed notice period of 90 days is appropriate.

# 3 Why Change?

In 2014, during the development of Modification 0431, British Gas raised concerns with the 20 <a href="mailto:dayBusiness Days">dayBusiness Days</a> notice period being too short. The proposer believes the success of the reconciliation excise will be based on individual parties' preparedness. The proposer believes 20 <a href="mailto:daysBusiness Days">daysBusiness Days</a> notice is insufficient for parties to request additional budget, obtain approval, acquire the additional resource and for IS teams to activate and re-test the portfolio query tool.

# 4 Code Specific Matters

#### **Reference Documents**

This proposal amends Scotia Gas Network (SGN) proposal, Modification 0431.

https://www.gasgovernance.co.uk/0431

This proposal references the new FGO arrangements that brought into effect the CDSP and amended many Code oblations.

https://www.gasgovernance.co.uk/0565

### 5 Solution

This proposal seeks to amend Section G 2.12.4 will be amended to give the User a minimum of 20.9060 Business days Days notice prior to the Portfolio Date relating to which the User must provide its Supply Portfolio.

# 6 Impacts & Other Considerations

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

None

### **Consumer Impacts**

None

### **Cross Code Impacts**

The proposer references iGT103 - Inclusion of reference within iGT UNC to UNC TPD Section G paragraph 2.12 – 2.14 inclusive - Meter Point Portfolio Reconciliation. This proposal seeks to introduce the Code requirement for iGT supply points to be included within the portfolio reconciliation exercise.

The proposer of this change will work closely with the IGT 103 proposer to ensure cross Code alignment. Specifically we believe iGT 103 notification period should align with the UNC arrangements.

#### **EU Code Impacts**

None

#### **Central Systems Impacts**

None

# 7 Relevant Objectives

Impact of the modification on the Relevant Objectives:

# Joint Office of Gas Transporters

Re	elevant Objective	Identified impact
a)	Efficient and economic operation of the pipe-line system.	<u>None</u>
b)	Coordinated, efficient and economic operation of  (i) the combined pipe-line system, and/ or	<u>None</u>
	(ii) the pipe-line system of one or more other relevant gas transporters.	
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.	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.	<u>None</u>
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.	<u>None</u>

This proposal should improve the administration of Code as it ensures all parties have sufficient notice to ensure the success of the portfolio reconciliation exercise.

# 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

No text has been provided.

### 10 Recommendations

# Proposer's Recommendation to Panel Workgroup

Panel Workgroup is asked to:

# Joint Office of Gas Transporters

- Agree that self-governance procedures should apply
- Refer this proposal is sufficiently developed to a Workgroup for assessment be issued to consultation.