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UNC Modification 0647 – Introducing Competition into DM Meter Reading

Distribution Workgroup – August 2018

Previous Discussions

- Solution Option 1 Retaining the principle of DM Mandatory Requirement in UNC and maintaining the SMPs as Class 1 within UK Link systems
- Solution Option 2 Retaining the principle of the DM Mandatory Requirement in UNC and utilising Class 2 in UK Link systems for Supply Meter Points meeting the Class 1 Requirement

c300 SMPs; 25 % of UK Gas Market (150,000,000,000 kWh AQ).



Solution Options

Solution Development:

- Solution Option 1 requires amendment to Portal screens to allow Shipper Users to update Class 1, and UDR to enable provision of Meter Readings by Shipper on Class 1 SMPs
- Solution Option 2 requires many validation changes to ensure that downstream processing is unimpacted – e.g.
 - in order for retention of SMP to LMN relationship changes will be required to consider Class 1 criteria, rather than the Class recorded on UKL,
 - changes for UK Link Application to UK Link Gemini files (to eliminate Gemini change)
- Reflection that Solution Option 2 is of equivalent complexity to UK Link systems compared to Option 1.
- Assessment with respect to complexity of change to UK Link Users has not been verified with Users, but expected to be equivalent change for Solution Option 1 or 2. Examples:
 - Solution Option 1 Users will need to ensure that Daily Readings processes reflect User to CDSP
 - Solution Option 2 Users will need to amend nomination logic for DM Mandatory SMPs to nominate as Class 2
 - This can be tabled at DSG to ratify this assessment, if requested?



Solution Options – Transition

Hard Cutover

- Immediately following modification implementation date the Shipper must provide Meter Readings for DM Mandatory SMPs
- Transitional Period
 - Phased transition to Shippers providing Meter Readings
 - Requires defined end point of Transitional period
- Each solution option provides different challenges, for example:
 - Solution Option 2 Requires data item to be amended on UK Link systems, therefore a process must be defined for amendment [by CDSP] in the event of failure to amend data condition by Shippers – this is true with hard or transitioned cutover
 - Forced Class Change does not exist as a system or process (this could be achieved by forced confirmation, but timescales are incompatible)**
- Each option can be assessed against the following Transition criteria:
 - Impacts to UK Link systems, including any short term system build requirements
 - Impacts to UK Link User systems DMSPs and Shipper Users
 - Impacts to Other Users AMRs and Suppliers
 - Impacts to UNC
 - Impacts to industry participant processes



Solution Options – 1 / Hard

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Class 1 SMP	Class 1 SMP
Readings provided by DMSP	Readings Provided by Shipper User
Readings received in DLC File (O10 Record)	Readings received in UDR(U12 Record)
Late Actuals can be provided by DMSP to GFD+5 (via O10 Record)	m647 Implementation Date GFD+4
Consumption Adjustments provided by DMSP to [DEFINED] period	
DM Mandatory SMPs = DMC in Gemini	DM Mandatory SMPs = DMC in Gemini
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Liabilities against Transporter? Or Suspend?	Liabilities against Shipper? Or Suspend?

- Hard Transition single day implementation Solution Option 1
 - UK Link system impacts no material impacts to UK Link identified for transition
 - Shipper User system impacts Users preparedness to receive Class 1 readings and issue UDR
 - If used, DMSP Users, or AMR provider [Issue readings in agreed format to [Shipper] Users or Suppliers]
 - Transitional impacts to UNC no transitional requirements
 - Impacts to processes
 - Industry readiness required for all processes for all SMPs for Day 1
 - End Consumption Adjustment period within defined period to conclude DMSP services?



Solution Options – 2 / Hard

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Class 1 SMP	Class 2 SMP
m647 Implementation Date +X m647 Implementation Date +X	
Readings provided by DMSP	Readings Provided by Shipper User
Readings received in DLC File (O10 Record)	Readings received in UDR(U12 Record)
Late Actuals can be provided by DMSP to GFD+5 (via O10 Record)	m647 Implementation Date GFD+4
Consumption Adjustments provided by DMSP to [DEFINED] period	m647 Implementation Date 1V
DM Mandatory SMPs = DMC in Gemini	DM Mandatory SMPs = DMC in Gemini
Liabilities against Transporter? Or Suspend?	Liabilities against Shipper? Or Suspend?

- Hard Transition single day implementation Solution Option 2
 - UK Link system impacts
 - Data conditions must be correct for Day 1 (all SMPs into Class 2)
 - Potential need for forced Class Change system process?
 - Shipper User / DMSP / AMR system impacts As Option 1
 - Impacts to processes As Option 1
 - Transitional Impacts to UNC In order to accommodate data changes, extend Class Change Period to accommodate CDSP forced confirmation and preparation? **X** Serve

Solution Options – 1 / Transition

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	Implementation	nentation Transition		n End Date	
	Transitio	on Period			
Class 1 SMP			Class 1 SMP		
Readings provided by DMSP			Readings Provided by Shipper User		
Readings received in DLC File (O10 Record)			Readings received in UDR(U12 Record)		
Late Actuals can be provided by DMSP to GFD+5 (via O10 Record)					
				End of m647 Transition Period GFD+4	
Consumption Adjustments provided by DMSP to [DEFINED] period					
				End of m647 Transition Period +X	
DM Mandatory SMPs = DMC in Gemini			DM Mandatory SMPs	s = DMC in Gemini	
Liabilities against Transporter? Or Suspend?	Liabilities - Assume cannot apply - r	no data conditions against which to apply	Liabilities against Sh	ipper? Or Suspend?	

- Transition Period Solution Option 1 Allows extended period for....
 - UK Link system impacts no material impacts to UK Link identified for transition
 - Shipper User system impacts Users preparedness to receive Class 1 readings and issue UDR
 - If used, DMSP Users, or AMR provider [Issue readings in agreed format to [Shipper] Users or Suppliers]
 - Transitional impacts to UNC no transitional requirements
 - Impacts to processes
 - Industry readiness NOT required for all processes for all SMPs for Day 1
 - End Consumption Adjustment period within defined period to conclude DMSP services?

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- Risks:
 - Parallel read services for same SMP?
 - Uncertainty for responsibility first past the post for readings?
 - Once UDR received, assume that this is deemed transitioned?
 - Waive liability within transition?

Solution Options – 2 / Transition

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Impleme	Implementation Transitio		
	Transition Period		
Class 1 SMP		Class 2 SMP	
	End of m647 Transitional Period X End of m647 Transitional Period A End of m647 Transitional Period -X		
Readings provided by DMSP		Readings Provided by	/ Shipper User
Readings received in DLC File (O10 Record)		Readings received in	UDR(U12 Record)
Late Actuals can be provided by DMSP to GFD+5 (via O10 Record)			
			End of m647 Transition Period GFD+4
Consumption Adjustments provided by DMSP to [DEFINED] period			
			End of m647 Transition Period +X
DM Mandatory SMPs = DMC in Gemini		DM Mandatory SMPs	s = DMC in Gemini
Liabilities against Transporter? Or Suspend?		Liabilities against Sh	ipper? Or Suspend?

- Transition Period Solution Option 2 Allows extended period for....
 - UK Link system impacts allows Users time to transition SMPs to Class 2
 - Shipper User system impacts Users preparedness to receive Class 1 readings and issue UDR
 - If used, DMSP Users, or AMR provider [Issue readings in agreed format to [Shipper] Users or Suppliers]
 - Transitional Impacts to UNC In order to accommodate data changes, extend Class Change Period to accommodate CDSP forced confirmation and preparation?
 - Impacts to processes
 - Industry readiness NOT required for all processes for all SMPs for Day 1
 - End Consumption Adjustment period within defined period to conclude DMSP services?

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- Risks:
 - Waive liability within transition?

Operational Transparency

- Solution Option 1 retains explicit transparency on DM Mandatory SMPs
 - Reduces changes to DES / BW
 - Reduces impacts to Users amending processes / systems to derive whether a site is DM Mandatory
 - Solution option 1 does have a detrimental short term impact on transparency if selected with transitional period
 - i.e. it is unclear who is responsible for readings
 - Any Shipper User taking the site is unclear whether DMSP has stood down from SMP
 - Need to define clearly the transitional rules
 - E.g. once 'transitioned' the DMSP service is no longer available
 - 'Transitioned' means submission of valid DM Meter Reading via UDR
 - Probably requires offline process to support



Discussion points - Summary

- Still remains some development within the workgroup to draw a final conclusion....
- Currently assessment feels to suggest disregarding Option 2
 - Views?
 - Do you want this ratified elsewhere? e.g. DSC ChMC / DSG?
- Some discussion threads to consider:
 - Solution Option 2 benefits of reduced system impacts are being eroded with every phase of analysis undertaken
 - IF Hard cutover is adopted Solution Option 2 will be complex to get data amended
 - IF Transition approach adopted Solution Option 2, benefits from greater transparency in transitional period (i.e. who is providing the service) but consequently has greater complexity to achieve that during Transition
 - However, Solution Option 2 has LESS ongoing transparency post implementation, as industry parties will need to assess whether the DM criteria are met, and may lead to volatility of SMPs in Class 1 (as there is an extended set of criteria to assess to determine whether a site needs classification)
- Views?