

UNC Workgroup Report		At what stage is this document in the process?
<h1>UNC 0619:</h1> <h2>Application of proportionate ratchet charges to daily read sites</h2>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; width: 100%;">01 Modification</div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; width: 100%; background-color: #0070c0; color: white;">02 Workgroup Report</div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; width: 100%; background-color: #d9ead3;">03 Draft Modification Report</div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; width: 100%; background-color: #f4cccc;">04 Final Modification Report</div> </div>
<p><b>Purpose of Modification:</b></p> <p>This modification will set the multiplier used to determine the Supply Point Ratchet Charge for daily read sites to one. The Supply Point Ratchet Charge will also have the transportation charges the site would have incurred if it had not breached its supply point offtake netted off.</p>		
	<p>The Workgroup recommends that this modification should be:</p> <ul style="list-style-type: none"> <li>subject to self-governance</li> <li>considered a material change and not subject to self-governance</li> <li>further assessed by a Workgroup</li> <li>proceed to Consultation</li> </ul> <p>The Panel will consider this Workgroup Report on <b>17 August 2017</b>. The Panel will consider the recommendations and determine the appropriate next steps.</p>	
	<p>High Impact:</p> <p>Shipper Users and Transporters</p>	
	<p>Medium Impact:</p> <p>N/A</p>	
	<p>Low Impact:</p> <p>N/A</p>	

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Timetable		
<b>Modification timetable:</b>		
Initial consideration by Workgroup	25 May 2017	 <a href="mailto:enquiries@gasgovernance.co.uk">enquiries@gasgovernance.co.uk</a>
Amended Modification considered by Workgroup	27 July 2017	 0121 288 2107
Workgroup Report presented to Panel	17 August 2017	Proposer: <b>Steve Mulinganie</b>
Draft Modification Report issued for consultation	17 August 2017	 <a href="mailto:steve.mulinganie@gazprom-energy.com">steve.mulinganie@gazprom-energy.com</a>
Consultation Close-out for representations	08 September 2017	 07990 972568
Final Modification Report available for Panel	11 September 2017	Transporter: <b>Wales &amp; West Utilities</b>
Modification Panel decision	21 September 2017	 <a href="mailto:Richard.Pomroy@wwutilities.co.uk">Richard.Pomroy@wwutilities.co.uk</a>
		 029 2027 8552 or 07812 973337
		Systems Provider: <b>Xoserve</b>
		 <a href="mailto:commercial.enquiries@xoserve.com">commercial.enquiries@xoserve.com</a>
		Other: <b>Gareth Evans (proposer rep)</b>
		 <a href="mailto:gareth@waterswye.co.uk">gareth@waterswye.co.uk</a>
		 07500 964447

# 1 Summary

## What

As part of the Project Nexus Solution, Product Class 1 and 2 sites will be subject to the ratchet regime. This proposal seeks to remove the 'penalty effect' of the ratchet charge regime for these customers otherwise a disproportionate penal charge would be levied on sites that breach their stated daily system offtake rate, even though they do not represent a risk to the management of the system by doing so.

## Why

If the ratchet charge regime is not reformed so that the ratchet costs levied are proportionate then the number of sites that may elect to become daily read will be severely limited, reducing settlement accuracy and hampering the development of innovative granular market products. For those sites that do elect to become daily read, Shippers are likely to continue to have to over-estimate peak capacity needs, resulting in an inflated and distorted view of peak system requirements.

## How

It is proposed that the calculation process for the Supply Point Ratchet Charge is changed in three ways.

- The ratchet charge multiplier is set according to a table (currently set at 1 for all End User Category (EUC) Bands).
- The transportation charges that a supply point would incur if had not ratcheted will be netted off the Supply Point Ratchet Charge.
- The ratchet charge will only apply for the period for when sites will be ratcheted (October to May)

The net impact of these changes would be to turn the Supply Point Ratchet Charge into a corrective invoice where the supply point is invoiced for the capacity costs it avoided by having a supply point offtake set too low.

No other changes to the ratchet regime are proposed, such as changing the period for which a ratchet charge can be incurred.

# 2 Governance

## Justification for Self-Governance, Authority Direction or Urgency

This modification may have a material impact as it is expected, for the customers impacted, to have a material impact on the commercial activities connected with shipping gas, or commercial activities related to, the shipping, transportation or supply of gas. It therefore should be sent to the authority for decision.

Panel determined the modification is likely to have a material effect on commercial activities related to, the shipping, transportation or supply of gas or operation of one or more pipe-line systems because it proposes material changes to these contractual arrangements and incentive regime used for Product Class 1 and 2 sites.

Modification 0619 will therefore follow Authority Direction procedures.

## Requested Next Steps

This modification should:

- be considered a material change and not subject to self-governance;
- proceed to Consultation.

The Workgroup considers the modification is sufficiently developed to be issued to consultation and that the changes proposed would have a material impact on the current contractual Ratchet Regime and therefore Authority Direction is recommended.

## 3 Why Change?

The industry is rolling out smart and advanced metering across the entire market allowing Shippers, Suppliers and Customers ready access to more granular consumption information remotely. At the same time, Project Nexus is introducing 4 new Supply Meter Point classes or Product Classes, which will allow market participants the ability to provide more granular consumption (read) data into central systems for all sites, thus driving more accurate and targeted settlement. As Product Class 1 and 2 are daily read products, they would be subject to the ratchet regime.

The application of ratchet incentive charges (which we consider to be penal) to daily read sites seems disproportionate considering the potential future utilisation of daily read submission by a wide range of customers, including SME, Micro business and Domestic consumers in Product Class 2, who have low consumption levels and who we believe do not represent a risk to the safe operation of the network. As it currently stands therefore the current regime is likely to limit the number of sites that will seek to be daily read as the risks of incurring penal charges will outweigh the settlement benefits.

For those sites that do elect to become daily read, it is likely that Shippers will continue (as they do now) to have to overestimate likely capacity requirements to minimise the risk of these penal charges being applied, resulting in an inflated view of peak system requirements which could lead to inefficient system investment.

## 4 Code Specific Matters

### Reference Documents

None identified.

### Knowledge/Skills

No specific skills or knowledge are necessary.

## 5 Solution

This modification proposes to change the ratchet charge calculation so that a site that does breach its supply point offtake incurs the same transportation charges for that higher capacity, without being unduly penalised. The proposed solution is to change how the Supply Point Ratchet Charge is calculated in two key regards:

## Multiplier

The multiplier used to inflate the Applicable Annual Rate of the LDZ Capacity Charge to derive the Supply Point Ratchet Charge will be set to 1.

## Netting of Charges paid

At present the Applicable Annual Rate used to calculate the Supply Point Capacity Charge does not take into account the capacity charges that a customer is already paying. As the intention of the modification is to ensure that customers who ratchet do not benefit from having not set their SOQ appropriately but are not unduly penalised either, the current ratchet charge regime needs to be changed in four ways:

- The LDZ Capacity charge that the site has paid prior to the Supply Point Capacity Charge will be netted off the Supply Point Capacity Charge (“Capacity Ratchet Amount”).
- A new charge, the Customer Capacity Ratchet Amount, will be levied to correct for the difference between the original and ratcheted LDZ Customer Charges.
- A new charge, the NTS Exit Capacity Ratchet Amount, will be levied to correct for the difference between the original and ratcheted LDZ Exit Capacity NTS (ECN) Charges.
- At present ratchet charges are not specifically linked to any settlement date, but is simply a lump sum linked is notionally linked to annual offtake. It is proposed that will only apply for the period where the Ratchet Regime is in operation (i.e October to May inclusive) and is linked to the ratchet charge to the date to ensure that the customer is charged in line with the principles set out above. The period for which the ratchet charge is applied is termed the “Ratchet Period”.

It is not proposed to have a corrective charge for the LDZ Commodity Charges as any increase in SOQ caused by a ratchet will either have no effect, or slightly reduce the charge to the shipper. It is therefore not cost-efficient to reflect this minor benefit in the ratchet calculation.

## Revised Ratchet Charge Calculation

The Ratchet Charge will be changed to reference three different types of transportation charges in its calculation.

Supply Point Ratchet Charge = Capacity Ratchet Amount + Customer Capacity Ratchet Amount + Exit Capacity Ratchet Amount

The components of the above calculation are calculated as follows:

- Capacity Ratchet Amount = (Annualised LDZ Capacity Charge after ratchet applied \* Ratchet Charge Multiplier \* Ratchet Period/365) – sum of LDZ Capacity Charge applicable prior during the Ratchet Period being applied.
- Customer Capacity Ratchet Amount = (Annualised LDZ Customer Charge \* Ratchet Charge Multiplier \* Ratchet Period/365) – sum LDZ Customer Charge applicable during the Ratchet Period prior to ratchet being applied.
- NTS Exit Capacity Ratchet Amount = (LDZ Exit Capacity NTS (ECN) Charges \* Ratchet Charge Multiplier \* Ratchet Period/365) – sum LDZ Exit Capacity Charge applicable during the Ratchet Period prior to Ratchet being applied.
- Ratchet Period = number days between 1<sup>st</sup> October of the applicable gas year and the day that the ratcheted capacity applies, which is the first calendar day of each month.

## Example

Site in the East Anglia LDZ, EA1 exit zone

	Unit rate	Per-ratchet (Annual)	Post-ratchet (Annual)	Annualised Difference
AQ (kWh)		20,000,000	20,000,000	
SOQ (kWh)		100,000	150,000	
LDZ Capacity	$0.8855 * SOQ^{-0.2155}$	£ 27,046.50	£ 37,175.25	£ 10,128.75
LDZ Commodity	$0.1815 * SOQ^{-0.2376}$	£ 2,360.00	£ 2,140.00	N/A
LDZ Exit Capacity	$0.0689 * SOQ^{-0.2100}$	£ 2,226.50	£ 3,066.00	£ 839.50
LDZ Customer Capacity	0.0052	£ 1,898.00	£ 2,847.00	£ 949.00
		£ 33,531.00	£ 45,228.25	£ 11,917.25

Assuming that the ratchet occurs on the 20<sup>th</sup> December then the 1<sup>st</sup> January (93 days after the 1<sup>st</sup> October) then the calculation is as follows:

	Calculation	Amount
<b>Ratchet Period</b>	93 days	
Capacity Ratchet Amount	$10,128.75 * 93 / 365$	£ 2,580.75
Customer Capacity Ratchet Amount	$839.50 * 93 / 365$	£ 213.90
NTS Exit Capacity Ratchet Amount	$949 * 93 / 365$	£ 241.80
<b>Total</b>		£ 3,036.45

## 6 Impacts & Other Considerations

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

No impact.

### Consumer Impacts

Consumer Impact Assessment	
Criteria	Extent of Impact
Which Consumer groups are affected?	<ul style="list-style-type: none"> <li>• Domestic Consumers</li> <li>• Small non-domestic Consumers</li> <li>• Large non-domestic Consumers</li> <li>• Very Large Consumers</li> </ul>

<p>What costs or benefits will pass through to them?</p>	<ul style="list-style-type: none"> <li>• This modification proposes to remove a key barrier to smaller sites becoming daily read by removing the risk of a ratchet charge;</li> <li>• Might improve cost targeting and allow the development for innovative products for these customers;</li> <li>• The combined effect of better settlement, improved cost targeting and product innovation should benefit competition in the marketplace.</li> </ul>
<p>When will these costs/benefits impact upon consumers?</p>	<ul style="list-style-type: none"> <li>• Following implementation on a date to be agreed.</li> </ul>
<p>Are there any other Consumer Impacts?</p>	<ul style="list-style-type: none"> <li>• Risks?</li> </ul>

### Cross Code Impacts

There is a potential UNC iGT cross code impact and a similar iGT UNC Modification may be required, which will be raised when this modification has been sufficiently developed.

### EU Code Impacts

None identified.

### Central Systems Impacts

There may be a minor impact on central systems to incorporate the proposed table.

### Workgroup Impact Assessment

- Some Workgroup participants consider the proposals in this modification would reduce barriers to entry for smaller sites which want to be daily read and utilise Product Class 2, by removing the risk of a ratchet charge;
- In addition, these changes might improve cost targeting and allow the development for innovative products for customers;
- The combined effect of better settlement, improved cost targeting and product innovation should benefit competition in the marketplace.
- However, other Workgroup Participants were concerned that these proposals would introduce a risk that DNOs would not be able to rely on stated SOQs, leading to inefficient network investment as the lack of a suitable incentive would not provide sufficient encouragement for parties to demonstrate correct behaviours.

### Rough Order of Magnitude (ROM) Assessment *(Cost estimate from CDSP)*

*Cost estimate from CDSP where the Modification relates to a change to a CDSP Service Document*

Insert text here

OR

## Rough Order of Magnitude (ROM) Assessment *(Workgroup assessment of costs)*

Cost estimate from CDSP	Insert text here
Insert Subheading here	Insert text here

## 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
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (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: (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.	Positive/Impacted
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

This modification ensures that the disproportionate impact of the Ratchet Charge regime will be removed so as to allow sites with lower levels of consumption, to benefit from being daily read. This will improve cost targeting and promote innovative products, so furthering relevant objective (d) *Securing of effective competition between Shippers*.

However, other participants felt that this modification would lead to inefficient investment in the networks and that this would impact cost targeting which could potentially impact competition and therefore have a negative impact on competition.

## 8 Implementation

This modification will remove a disincentive to sites becoming daily read, but there will be no obligation on Shippers to take advantage of this change, so there will be no costs imposed on parties.

No formal timescales are proposed for implementation, but some Workgroup participants would like to see these changes implemented in time for the start of the gas year 2017/18, i.e. 1st October 2017.

## 9 Legal Text

*Insert Proposers Suggested Legal Text where provided and not superseded by Transporters Text.*

*Legal text will be drawn up by the relevant Transporter at a time when the modification is sufficiently developed in line with the [Legal Text Guidance Document](#).*

Legal Text has been provided by [name] and is [included below/published alongside this report]. The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution.

### Text Commentary

Insert text here

### Text

Insert text here

## 10 Recommendations

### Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that:

- This modification should proceed to consultation.

### Insert subheading here

Insert text here