



UNC Modification	At what stage is this document in the process?
<h1>UNC 0641:</h1> <h2>Amendments to Modification 0431 - Shipper/Transporter - Meter Point Portfolio Reconciliation rules and obligations</h2>	<div> <div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>This proposal seeks to amend the rules to extend the portfolio reconciliation notice period as and when the GDN Transporters deem an Industry reconciliation exercise is necessary.</p> <div> <div>  <p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> subject to self-governance assessed by a Workgroup <p>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.</p> </div> <div>  <p>Low Impact:</p> <p>The proposer believes there will be a low impact to shippers, Suppliers, GDN Transporters and the Central Data Service Provider (CDSP).</p> </div> </div>	

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Timetable	
The Proposer recommends the following timetable:	
Initial consideration by Panel	21 December 2017
Workgroup Report presented to Panel	18 January 2018
Draft Modification Report issued for consultation	18 January 2018
Consultation Close-out for representations	07 February 2018
Final Modification Report available for Panel	12 February 2018
Modification Panel decision	15 February 2018 (considered at short notice)



Any questions?

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1 Summary

What

The Xoserve Funding, Governance and Ownership (FGO) Project amended UNC text resulting in the Central Data Service Provider (CDSP) owning the obligation relating to the portfolio reconciliation exercise introduced by Modification 0431 - **Shipper/Transporter - Meter Point Portfolio Reconciliation**. The proposer believes the Code obligation should be reversed back to GDN Transporters, as the CDSP is a data processor and not a data controller.

Further to the above, we believe the notice period of 20 days is too short to enable parties to prepare for the reconciliation exercise.

Why

During the FGO project many of the Transporter obligations were migrated to the new CDSP. Whilst we supported this process, we now believe for the reconciliation exercise obligations should remain with the GDN Transporters, as they are the data owner.

We also believe the notice period of 20 days is too short for shippers and their relevant suppliers to make appropriate arrangements to ensure there is adequate resourcing to undertake the reconciliation exercise successfully.

How

We suggest that Legal text is reversed to replace the Modification 0431 obligations back with the GDN Transporters (excluding NTS) and the reconciliation exercise notice period is extended from 20 days to a minimum of 90 days.

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 and to confirm that Transporters are the data owners, so they rather than the CDSP should own the reconciliation exercise Code obligations.

3 Why Change?

In 2014, during the development of Modification 0431, British Gas raised concerns with the 20 day notice period being too short. The proposer believes the success of the reconciliation exercise will be based on

individual parties' preparedness. The proposer believes 20 days 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.

The proposer believes, because the CDSP is the data processor, rather than the data controller, the obligation under Code for the reconciliation exercise should be returned as a Transporter obligation. [why the Transporter, as the information is held in the CDSP systems?, why not a Shipper obligation)

It should be noted as per the original rules this proposal would not seek to interfere with the Transporter wishing to discharge their obligation to the CDSP. This proposal believes this proposed change will align the IGT UNC Transporter obligations and the UNC Transporter Code obligations.

4 Code Specific Matters

Reference Documents

This proposal builds on the 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 obligations.

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

5 Solution

This proposal seeks to amend Section G 2.12, 2.13 and 2.14 of the UNC by replacing where relevant the reference to the CDSP with Transporter. (The obligation does not extend to NTS).

Specifically, 2.12.4 will be amended to give the User a minimum of ~~20~~ 90 Business 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:	
Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	
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.	
c) Efficient discharge of the licensee's obligations.	
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.	
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.	
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.	

This proposal should improve the administration of Code and the governance arrangements by correctly applying the reconciliation exercise obligation to the correct parties. It also 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

Panel is asked to:

- Agree that self-governance procedures should apply
- Refer this proposal to a Workgroup for assessment.