

UNC Workgroup Report	At what stage is this document in the process?
<h1>UNC 0641S:</h1> <h2>Amendments to Modification 0431 - Shipper/Transporter - Meter Point Portfolio Reconciliation rules and obligations</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 01 Modification </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 02 Workgroup Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 03 Draft Modification Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;"> 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>	
	<p>The Workgroup recommends that this modification should be:</p> <ul style="list-style-type: none"> subject to self-governance returned to Workgroup for further assessment <p>The Panel will consider this Workgroup Report on 15 February 2018. The Panel will consider the recommendations and determine the appropriate next steps.</p>
	<p>High Impact:</p> <p>None</p>
	<p>Medium Impact:</p> <p>None</p>
	<p>Low Impact:</p> <p>Shippers, Suppliers, Transporters and CDSP</p>

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2 Governance	3	 enquiries@gasgovernance.co.uk
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4 Code Specific Matters	4	Proposer: Andrew Margan
5 Solution	4	 Andrew.margan@centrica.com
6 Impacts & Other Considerations	4	 07789 577327
7 Relevant Objectives	Error! Bookmark not defined.	Transporter: Cadent
8 Implementation	6	 email address Chris.Warner@cadenttgas.com
9 Legal Text	7	 telephone 07749 983418
10 Recommendations	7	Systems Provider: Xoserve
Timetable		 commercial.enquiries@xoserve.com
Modification timetable:		
Initial consideration by Workgroup	05 January 2018	
Workgroup Report presented to Panel	15 February 2018	
Draft Modification Report issued for consultation	15 March 2018	
Consultation Close-out for representations	09 April 2018	
Final Modification Report available for Panel	11 April 2018	
Modification Panel decision	19 April 2018	

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 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, it is understood that the notice period of 20 days is too short to enable parties to prepare for the reconciliation exercise and that this should be extended.

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.

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

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

2 Governance

Justification for Self-Governance, Authority Direction or Urgency

Panel determined that this modification is unlikely to have a material effect on any party, therefore the change can proceed under the self-governance arrangements.

Modification 0641S will therefore follow self-governance procedures.

Requested Next Steps

This modification should:

- be considered a non-material change and subject to self-governance
- returned to Workgroup for further assessment

The Workgroup notes that the proposer is considering the scope of the change and request that more time is allowed to consider any further amendments to the modification.

3 Why Change?

In 2014, during the development of Modification 0431, concerns were raised with the 20 day notice period being too short. It is felt that the success of the reconciliation exercise will be based on individual parties' preparedness. With the 20 days notice period being 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.

As 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.

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

4 Code Specific Matters

Reference Documents

This proposal builds on the proposals implemented in 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 – Modification 0565A.

<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 GDN 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

Consumer Impact Assessment	
Criteria	Extent of Impact
Which Consumer groups are affected?	No direct consumer impacts identified.
What costs or benefits will pass through to them?	None identified.
When will these costs/benefits impact upon consumers?	None identified.
Are there any other Consumer Impacts?	None identified.

Cross Code Impacts

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

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 identified.

Central Systems Impacts

None identified.

Workgroup Impact Assessment

This modification would ensure that Transporters are correctly identified as the data controller for these exercises and corrects an error in UNC identifying the CDSP as the data controller when they are considered to be a data processor.

In addition, by extending the notice period from 20 Business Days to 90 Business Days, will provide sufficient time for the Shipper to mobilise the necessary resources to ensure the exercise is successfully undertaken and funded.

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 <i>(Workgroup assessment of costs)</i>	
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.	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.	None
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.	None

This modification should further Relevant Objective f) Promotion of efficiency in the implementation and administration by ensuring the governance arrangements are correctly applied by assigning 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.

As fast track self-governance procedures are proposed, implementation could be sixteen business days after a unanimous vote in favour of implementation by the Modification Panel, subject to no Objection being raised.

9 Legal Text

Legal Text is to be 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 proposal requires further assessment and should be returned to Workgroup.