

Stage 02: Workgroup Report

0437S:

Retention of MAM Id in Transporter Systems at Change of Shipper

At what stage is this document in the process?



At Change of Shipper, Transporters delete the previous Meter Asset Manager (MAM) information, requiring the incoming Supplier through their Shipper to provide updated Meter Asset Manager information. This UNC Modification seeks to enable a change to Transporter systems, paid for by Users (i.e. Class 3 UK Link Modification), to retain the MAM Id at a Change of Shipper event.



The Workgroup recommends that this self-governance modification should proceed to Consultation



High Impact:



Medium Impact:



Low Impact:
Transporters

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About this document:

This report will be presented by the Workgroup to the panel on 17 January 2013.

The panel will consider whether the modification is sufficiently developed to proceed to Consultation and to submit any further recommendations in respect of the definition and assessment of this self-governance modification.


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1 Summary

Is this a Self-Governance Modification?

The Modification Panel determined that this is a self-governance modification.

Why Change?

A significant population of blank MAM Ids exist (circa 350k) where the current Shipper has failed to notify the Transporters of the MAM Identity. Currently at a Change of Shipper for given meter point, the Transporters notify the incoming Shipper of the MAM Id. Transporters then delete this data, and the Supplier via their Shipper should provide details of the relevant MAM once appointed. Where this data is not provided by the new Shipper, the Transporter is unable to provide any MAM information to subsequent Shippers at future supply point transfers.

This presents a risk to Suppliers by not knowing the incumbent MAM when they take over a site this hinders the ability to contact and subsequently contract with that MAM for provision of Metering Services.

Solution

Currently Transporters provide the MAM Id to the incoming shipper at D-7. This is then deleted at D, with the expectation that this will be provided by the incoming supplier through their shipper. When that shipper fails to do so, and then the site transfers again, the MAM information is not able to be provided.

The change proposed requires the Transporter to retain this data (i.e. not delete it at a Change of Shipper event).

Once populated, retention of this data will ensure that MAM Id can be provided to future incoming Shippers. Where this data has been superseded (and not updated to the Transporter by the relevant shipper), the provision of the (superseded) MAM data would provide a starting point for incoming Suppliers to engage MAMs. In instances where this data is superseded, the identified MAM should – by virtue of the appointment / deappointment flows that are passed – know the identity of the MAM who superseded them at the meter point.

Suppliers should retain the responsibility to update this information, as currently, even where this data is not changed which is in line with obligations in RGMA and will eliminate implementation costs to Users' own systems, and will ensure that the data maintained within Transporter systems will be as current as possible. Changes to the Uniform Network Code text are not anticipated. This Modification is required by UNC section U 8.5.2 which states that any Class 3 Modification (i.e. change to Transporter systems paid for by Users) a Modification Proposal must be made in accordance with the Modification Rules.

The solution option has been proposed, following extensive consultation with the SPAA Expert Group. UK Link Committee have also discussed this change, and the proposed solution.

Relevant Objectives

This modification would enable effective competition (relevant objective (d)) as failure by a previous Supplier currently impacts the Supplier's ability to identify and contract with the relevant MAM. There are some potential positive impacts in regard to relevant objective (c), Efficient Discharge of Supplier Licence, to ensure that MAM Id is populated, and reduce unnecessary exceptions. However, Suppliers must retain responsibility to provide updates – even where this is not changed – in order to comply with their obligations.

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Implementation

As this is a self-governance modification, implementation could be 16 business days after a Modification Panel decision to implement.

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2 Why Change?

Benefits Proposal

Currently at a Change of Shipper for given meter point, the Transporters notify the incoming Shipper of the MAM Id. Transporters then delete this data, and the new Shipper should provide details of the relevant MAM, once appointed. Where a Shipper fails to do so, the Transporter is unable to provide any MAM information to subsequent Shippers at the next supply point transfer.

This presents a risk to subsequent Suppliers by not knowing the incumbent MAM when they take over a site this hinders the ability to contact and subsequently contract with that MAM for provision of Metering Services.

Currently Transporters provide anonymised count of meter points by Shipper to SPAA, which through it's SPAA Expert Group monitors the population of blank MAM Identities. A number of exercises have been conducted by some Shippers to populate blank MAM information. Despite these exercises, a significant population of blank MAM Ids exist (circa 300-350k) where the current Shipper has failed to notify the Transporters of the MAM Identity.

Shippers will retain the responsibility to update the MAM Identity – even where this is not changed from existing data held in Transporter systems. The existing [Supplier licence and SPAA] obligations to provide this information are not changed by the modification.

3 Solution

Impact to Uniform Network Code

This change is proposed as a Class 3 UK Link Modification, as defined in Section U 8.4.2 (a) of UNC i.e.:

[A] Transporter System Modification where the Transporters do not intend to make such modification unless the costs of making the modification are to be recovered from UK Link Users.

Changes to the Uniform Network Code are not anticipated.

This Modification is required by UNC section U 8.5.2 which states that:

Before a Class 3 Modification may be made by the Transporters, a Modification Proposal in respect thereof must be made in accordance with the Modification Rules and the Transporters or any User shall be entitled to make such a Modification Proposal.

Impact to Transporter and UK Link User Systems

Analysis has been conducted by Xoserve regarding solution options in conjunction with the SPAA Expert Group. The solution proposed has been defined and agreed within this group. Members of the SPAA Expert Group considered that the solution proposed would ensure that no changes would be required to Suppliers/Shippers' systems.

The solution proposed has been discussed and ratified by the UK Link Committee.

Currently Transporters provide the MAM Id to the incoming shipper at D-7. This is then deleted at D, with the expectation that this will be provided by the incoming Supplier through the Shipper. When that shipper fails to do so, and then the site transfers again, the MAM information is not able to be provided.

The change proposed requires the Transporter to retain this data (i.e. not delete it at a Change of Shipper event).

Once populated, retention of this data will ensure that MAM Id can be provided to any future incoming Shippers. Suppliers should retain the responsibility to update this information, as currently, even where this data is not changed. Observance of the obligations to provide this data will eliminate implementation costs to Users' own systems, and will ensure that the data maintained within Transporter systems will be as current as possible.

User Pays

Classification of the modification as User Pays, or not, and the justification for such classification

This is a User Pays Modification.

Identification of Users, proposed split of the recovery between Gas Transporters and Users for User Pays costs and justification

100% Users.

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Proposed charge(s) for application of Users Pays charges to Shippers

Proposed share of costs by meter point portfolio share excluding DM and Unique Sites as at Modification implementation date.

Proposed charge for inclusion in ACS – to be completed upon receipt of cost estimate from Xoserve

A Rough Order of Magnitude has been provided by Xoserve – indicating a cost in the order of £68k–£96k.

4 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.	Positive
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
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 would enable effective competition (relevant objective (d)) as failure by a previous Supplier currently impacts the Supplier's ability to identify and contract with the relevant MAM. There are some potential positive impacts in regard to relevant objective (c), Efficient Discharge of Supplier Licence, to ensure that MAM Id is populated, and reduce unnecessary exceptions. However, Suppliers must retain responsibility to provide updates – even where this is not changed – in order to comply with their obligations.

5 Implementation

As self-governance procedures are proposed, implementation could be 16 business days after a Modification Panel decision to implement. However, it should be noted that estimated implementation timescales will be 26 weeks from the point that this change is scheduled by Transporters within their Change Programme.

6 Legal Text

Text

No amendment to UNC text is expected.

7 Recommendation

The Workgroup invites the Panel to:

- AGREE that this self-governance modification should be submitted for consultation.