

0431S:

Shipper/Transporter - Meter Point Portfolio Reconciliation

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This Modification Proposal seeks to improve the completeness of the data held by Transporters on behalf of industry parties by carrying out a MPRN portfolio reconciliation between Shipper records and Sites & Meters.



The Workgroup recommends that this modification should be issued to consultation.



High Impact:
Shippers



Medium Impact:



Low Impact:

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About this document:

This report will be presented by the Workgroup to the Panel on 19 September 2013.

The Panel will consider whether the modification is sufficiently developed to proceed to consultation and to consider any further recommendations in respect of this self-governance modification.



3 Any questions?

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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?

Some sites may be billed by Suppliers but not be registered to a Shipper on the Sites and Meters database, hence creating unidentified gas and not delivering the correct allocation of costs despite supply arrangements being in place.

Solution

It is proposed that Shippers will obtain from Supply businesses a dataset of billable MPRNs and provide this to Xoserve. Xoserve will match the dataset against the MPRN data they hold and identify any MPRNs for which a supply arrangement is in place but the MPRN is not registered to a Shipper. If Shippers fail to register these MPRNs through the standard process, they will be able to be automatically registered.

Relevant Objectives

Implementation would be expected to increase the accuracy of data held by Xoserve and reduce the number of unregistered sites.

Consequently there may be less unidentified gas and costs would be more appropriately allocated, thereby helping to secure effective competition

Implementation

As this modification was determined to follow self-governance procedures, implementation could be 16 Days following a Modification Panel decision to do so.

If a decision to implement the modification is made before the 1st January 2014, Transporters anticipate requesting an initial report based on Supplier portfolios as of the 1st February 2014,.

It is expected that reports will be requested during November in subsequent gas years.

2 Why Change?

The accuracy of centrally held data impacts the reliability of settlement and cost allocations. A number of initiatives have been launched to improve data accuracy, and there has been particular focus on the number of live meter points that have not been registered by a Shipper – shipperless sites. It is possible that some shipperless sites are being billed by Suppliers. Xoserve, the Transporters' Agent, has no access to this Supplier information. Reconciling Xoserve and Supplier held data could validate and improve industry data.

3 Solution

It is proposed to introduce an obligation on Shippers to endeavour to provide MPRN information from supply business systems to allow the Transporters' agent to carry out a reconciliation (on behalf of the Transporters) against the information that it holds. For clarity, it is proposed that the Transporters' agent will only identify live/billable MPRNs provided by Shippers that are not present or registered to a Shipper on Xoserve's systems i.e. unregistered or shipperless. They will not be required to also identify sites registered to a Shipper but not present in the data provided (this is an exercise which Suppliers/Shippers can carry out themselves without access to central systems).

It is proposed that Shippers be obliged to provide, for each Supply business that they ship for, each MPRN and the associated Meter Serial Number, Full Postcode and the Shipper and Supplier short codes.

The Transporters' agent will complete a reconciliation exercise and reports will be provided to Shippers detailing the MPRNs that they have provided under the terms of this modification but which are not registered against that Shipper. The Shipper concerned shall be expected to register each MPRN on the provided report within 25 business days from the report issue date or, if the Shipper does not consider this action to be appropriate, provide a reason for non-registration to the Transporters' agent within 25 business days from the report issue date. If Shippers request additional time, it is proposed that the Transporters agent be able to grant up to an additional 50 business days. If the Shipper does not either register the MPRN or provide a reason for non-registration within the allowed timescale, the Transporters agent will register the MPRN on behalf of the Shipper.

The data that maybe from Shippers excludes meters connected to an iGT network – i.e. MPRNs beginning with 74xxxx and 75xxxx.

Detailed business rules:

1. Shippers will be obligated to take a data extract from a Non Business Day, for the avoidance of doubt this report will only be taken once in any gas year and will typically take place in November, however if the implementation is delayed the first report will be taken in February. The request for a report will be given with 20 business days notice as and when the transporters deem a reconciliation exercise is necessary. Reports will be scheduled from all Shippers at the same time and will require the extract date to be the date given by the Transporter's agent.
2. The data extract will be sourced from the current live billable customer database supply portfolio of the associated Supplier for each Shipper. The data extract will include all MPRNs which are currently live in the database where an end user supply contract is in place. Shippers will use all reasonable

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endeavours to provide the data extract to the transporters agent within 15 business days of the agreed extract date and will specify a reason should this not be possible.

The data extract which is provided to the Transporter's agent will detail the following:

- MPRN
- Meter serial number
- Post Code
- Shipper & Supplier Short Codes

The data extract which is provided will be extracted from the Suppliers billable customer database. If sites have been aggregated then the data will show the relevant MPRNs with the relevant meter serial numbers.

The report that is provided to the Transporters agent will state the date when the data extract was taken.

3. Shippers shall use reasonable endeavours to secure the supply portfolio of a Supplier with which it has a shipping arrangement. Where a Shipper is not the same legal entity as the supplier or within the same group of companies and is unable to secure the supply portfolio the Shipper shall report the fact, together with the reason why the Supplier is unable to fulfil the request. This response to the Transporters agent shall be given within 15 business days of the agreed extract date.
4. In the event that the Shipper has been unsuccessful in securing the supply portfolio of a Supplier to whom it is contractually associated with then the Shipper will provide the Supplier's contact details to enable the Transporters agent to make a direct request to the Supplier for this information.
5. The Transporters agent will complete a portfolio reconciliation exercise using the business rule 2 data provided by the Shipper and the MPRN data held on the Supply Point Register
6. Where the Transporters agent identifies an MPRN detailed on the Shipper's report which is unregistered, Shipperless, has a status of dead and extinct on the Supply Point Register database or is not present at all on the Supply Point Register database or duplicated, then they will provide a report to each relevant Shipper specifying these MPRN's. If a new MPRN is identified on the Shippers report then they will be expected to follow the current procedures for creating & registering a new MPRN.
7. The Transporters agent will provide the Business Rule 6 report to each Shipper as soon as is reasonably practicable from the provision of the Business Rule 2 data extract by the Shipper.
8. The relevant Shipper will commence the registration of any MPRNs on the Business Rule 6 report within 25 business days from receipt of the business rule 6 report, registration will be prospective. Alternatively where the Shipper considers it would not be appropriate to register an MPRN, it will provide a reason to the Transporters agent for not completing this exercise.
9. If the Shipper is unable to commence the registration of the MPRN within the provision of Business Rule 8 due to further investigations being required then they will provide a reason for requiring additional time to the Transporters agent who will then grant up to an extra 50 business days (25+50 = 75 business days in total) to commence the registration of the MPRN. If within the original 25 day period or within the additional 50 day period, the Shipper fails to provide a reason for not having commenced the registration of the MPRN and the Supply Point remains un-registered, the Transporters agent may register the MPRN on the Shipper's behalf.
10. This rule will apply if there is a need to automatically register the site. Should any additional information be required to register the MPRN by the

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Transporters agent then an additional request for data items will be submitted to the relevant Shipper. The Shipper will provide any additional information within 15 business days from the Transporters agent.

11. Once the portfolio reconciliation exercise has been completed by the Transporter's agent an anonymised report will be generated indicating the following by Shipper organisation:

The number of MPRNs provided by the Shipper to the Transporters agent which on the extract date were:

- (i). At an unregistered status on Sites and Meters.
- (ii). At a Shipperless status on Sites and Meters.
- (iii). Not present at all on Site and Meters.
- (iv). Are duplicated (i.e an MPRN appearing on two or more Supplier portfolios.)
- (V). At a Status of either dead or extinct

The Shipper organisation names will be anonymised on this report.

A non-anonymised report will be provided to Ofgem.

Time Line of Events

Business Days	20	Extract Date	15		25	50	15
Process	Notification	Extract	Report Provision / Non Delivery	User Data Reconciliation and Provision of Report	Shipper Registration / Reason for non Registration	Transporter Grants Additional Time	Provision of Additional Data Items

User Pays

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

It is expected that there will be minor costs involved in implementing this change but no system changes, and therefore this modification will not be classified as User Pays.

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

n/a

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

n/a

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

n/a

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

Objective c)

The reconciliation of the data held by the Transporters' agent may reduce the number of unregistered sites thus meeting licence condition 7 which is concerned with the Transporters' obligations to investigate the illegal offtaking of gas.

Objective d)

Implementation would be expected to reduce the number of unregistered sites and increase the accuracy of data held by Xoserve.

Consequently there may be less unidentified gas and costs would be more appropriately allocated, thereby furthering effective competition.

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5 Implementation

As this modification was determined to follow self-governance procedures, implementation could be 16 Days following a Modification Panel decision to do so.

If a decision to implement the modification is made before the 1st January 2014, Transporters anticipate requesting an initial report based on Supplier portfolios as of the 1st Non business day in February 2014,.

It is expected that reports will be provided during November in subsequent years.

6 Legal Text

Text

The following Text has been prepared at the request of the Modification Panel.

Please insert as Paragraphs 2.12, 2.13 and 2.14 in Section G of the Transportation Principal Document under Paragraph 2.11.4.

2.12 Supply Portfolio

- 2.12.1 The Transporters shall be entitled to request from each User a copy of the supply portfolio of each supplier with whom the User is contracted as at the date identified in 2.12.2 (“**Supply Portfolio**”).
- 2.12.2 Subject to paragraph 2.12.3 and 2.14.1 the Supply Portfolios will be extracted as of the first non Business Day of November in each Gas Year (“**Portfolio Date**”).
- 2.12.3 During the Gas Year commencing 1 October 2013 the Transporters shall be entitled to request Supply Portfolios in February 2014.
- 2.12.4 If the Transporters require Users’ Supply Portfolio(s), the Transporters shall place a request for a report no less than 20 Business Days prior to the Portfolio Date.
- 2.12.5 The User must comply with the Transporters’ request under paragraph 2.12.1 and provide the Supply Portfolio to the Transporters within 15 business days of the Portfolio Date unless unable to do so under paragraph 2.14.2.
- 2.12.6 The Supply Portfolios shall include all billable Supply Meter Point Reference Numbers that are currently live in each Supplier’s database where a Supply Contract is in place and shall detail the following data:
- (a) Supply Meter Point Reference Numbers;
 - (b) meter serial number of the Supply Meter;
 - (c) premises post code; and
 - (d) Shipper short codes and supplier short codes
- 2.12.7 On receiving the Users Supply Portfolio, the Transporter will reconcile the Supply Portfolio against the data held on the Supply Point Register and all other Supply Portfolios provided by other Users.

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2.13 User Data Reconciliation

- 2.13.1 Upon completion of the reconciliation under paragraph 2.12.7, the Transporters shall provide a report (“**Reconciliation Report**”) to the relevant User as soon as reasonably practicable from receipt of the supplier’s Supply Portfolio.
- 2.13.2 A Supply Meter Point Reference Number has an “**Unregistered Status**” if it has not previously held a Supply Point Registration by any User on the Supply Point Register and at the time of the creation of the Reconciliation Report is not subject to a Supply Point Confirmation.
- 2.13.3 A Supply Meter Point Reference Number has an “**Shipperless Status**” if it has previously held a Supply Point Registration by any User on the Supply Point Register and at the time of the creation of the Reconciliation Report is not subject to a Supply Point Confirmation.
- 2.13.4 The Reconciliation Report will specify to each relevant User the Supply Meter Point Reference Number(s) detailed on the User’s supplier’s Supply Portfolio which are at that time:
- (a) at an Unregistered Status on the Supply Point Register;
 - (b) at a Shipperless Status on the Supply Point Register;
 - (c) not present on the Supply Point Register;
 - (d) duplicated on any other User’s Supply Portfolio;
 - (e) at a Status of either dead or extinct on the Supply Point Register.
- 2.13.5 Subject to paragraph 2.13.6, the User shall commence the registration of any Supply Meter Point Reference Number identified in the Reconciliation Report as having a Shipperless Status or Unregistered Status within 25 Business Days of receiving the Reconciliation Report (“**Registration Period**”).
- 2.13.6 Where the User considers it would not be appropriate to register a Supply Meter Point Reference Number it will provide a reason to the Transporter for not commencing Registration within the Registration Period.
- 2.13.7 For the avoidance of doubt in relation to paragraph 2.13.4(c) and subject to paragraph 2.13.6, Users will be required to rectify these issues by creating a Meter Point Reference Number and completing the Supply Point Confirmation of the same.
- 2.13.8 Where the User is unable to commence the registration of the Supply Meter Point Reference Number within the provision of paragraph 2.13.6 and 2.13.7 due to further investigations being required then they will provide a justification for requiring additional time to the Transporter who shall, at its sole discretion, be entitled to grant the User an additional period of up to 50 Business Days beyond the Registration Period in which to commence the registration of the Supply Meter Point Reference Number (“**Extension Period**”).
- 2.13.9 Where the Transporter and the User agree that the User is unable to complete the investigation as per paragraph 2.13.8 the User shall be obligated to provide any information it has obtained in respect of the Supply Point to the Transporter.
- 2.13.10 If within the Registration Period or the Extension Period the User does not obtain a Supply Point Confirmation, or has failed to provide a reason as per paragraph 2.13.6 the User shall be deemed to have granted the Transporter authority to register such Supply Meter Point using the information on the Supply Point Register.
- 2.13.11 Where the Transporter requires additional information to register the Supply Meter Point Reference Number under paragraph 2.13.10 then an additional

request for data items will be submitted to the User. The User shall provide any requested additional information within 15 Business Days from the Transporters' request ("**Information Period**").

- 2.13.12 Following the provision of Reconciliation Reports the Transporter will publish a report detailing for each Reconciliation Report to each User (on a non-attributable basis) and the Authority (on an attributable basis) the following:
- (a) The number of Supply Meter Point Reference Numbers at an Unregistered Status;
 - (b) The number of Supply Meter Point Reference Numbers at a Shipperless Status;
 - (c) The number of Supply Meter Point Reference Numbers not present on the Supply Point Register;
 - (d) The number of duplicated Supply Meter Point Reference Numbers on any other User's Supply Portfolio;
 - (e) The number of Supply Meter Point Reference Numbers with a status of either dead or extinct.

2.14 Supplier Data

- 2.14.1 Where a User is a separate legal entity to the supplier or is not the holding company or subsidiary company of the supplier or any company which is a subsidiary of such a holding company and is unable to obtain the Supply Portfolio then, the User shall confirm this to the Transporter along with substantiated justification as to why the supplier is unable to fulfil the request. Users shall provide this information to the Transporter within 15 Business Days from the Portfolio Date.
- 2.14.2 In the event that the User has been unsuccessful in obtaining the Supply Portfolio under paragraph 2.14.1 then the User will provide the Supplier's contact details to the Transporter who shall be entitled to make a direct request to the Supplier for this information.

7 Recommendation

The Workgroup invites the Panel to:

- The Workgroup wished to invite the Panel to agree the Self-Governance Statement should be withdrawn based on the criteria that there is a material impact on competition by the registration elements of the modification

The modification is likely to have a material effect on (bb) competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

- Agree that the modification should be submitted for consultation.

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