

CODE MODIFICATION PROPOSAL No xxxx
Amendment to Protected Information Provisions to facilitate DNO compliance with
SPAA Schedule 23
DRAFT
Version 0.1

Date: 23/09/2008
Proposed Implementation Date: To be identified.
Urgency: Non Urgent

1 The Modification Proposal

a) Nature and Purpose of this Proposal

Distribution Network Operators (DNOs) are signatories to the Supply Point Administration Agreement (SPAA). SPAA supports the provision of information by the DNO to Suppliers.

Currently, DNOs, through their service provider, provide data to Shippers but do not provide data to Suppliers. This anomalous arrangement arises because of a mismatch between the supplier centric nature of the relevant SPAA Schedule and the permissions laid down in the UNC and the terms of the DNO's Transporter licence.

In considering the application of SPAA Schedule 23 and hence granting access to Suppliers, the following considerations are relevant:

The 'Protected Information' provisions contained within TPD Section V5 of the UNC place restrictions on Transporters ability to disclose Protected Information. However, there are a few circumstances where this is permitted, one of these being where DNOs are required to do so to under licence.

Section 105 of the Utilities Act does not apply in respect of the prohibition of disclosure of Protected Information where such disclosure is required to be made by a Transporter as a condition of its Licence.

Gas Transporter Licence Standard Special Condition (SSC) A31 requires the Transporter to disclose specified information to those recipients listed in SSC A31. Legitimate recipients include 'an appropriate person specified in UNC for balancing or change of supplier (COS) purpose'.

The Supplier is not one of the parties falling under this category. Hence the protection afforded by the combination of UNC and SSC A31 would not apply.

NGD believes that it is important that this anomaly is resolved to deliver the intent of the SPAA Schedule 23. Therefore the following solution is proposed:

Modification of the UNC is required to introduce an exception to the Protected Information provisions in Section V5.5 to permit DNOs to disclose Protected Information for change of supplier purposes to suppliers.

b) Justification for Urgency and recommendation on the procedure and timetable to be followed (if applicable)

Urgent procedures are not sought for this Modification Proposal.

c) Recommendation on whether this Proposal should proceed to the review procedures, the Development Phase, the Consultation Phase or be referred to a Workstream for discussion.

[This Modification Proposal has been discussed in draft by the UNC Distribution Workstream. No further development is required and therefore it is proposed that the consultation phase is initiated].

2 Extent to which implementation of this Modification Proposal would better facilitate the achievement (for the purposes of each Transporter's Licence) of the Relevant Objectives

Introducing Suppliers as a class of persons permitted under UNC to receive Protected Information as described above would satisfy disclosure under SSC A31, would meet the requirements of Section 105 of the Utilities Act and would fulfil the aspirations of Schedule 23 of SPAA to permit access to data for all Suppliers. Implementation would therefore facilitate SSC A11.1(c): "so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence".

3 The implications of implementing this Modification Proposal on security of supply, operation of the Total System and industry fragmentation

No such implications have been identified.

4 The implications for Transporters and each Transporter of implementing this Modification Proposal, including:

a) The implications for operation of the System:

No such implications have been identified

b) The development and capital cost and operating cost implications:

Systems implementation costs are expected to be incurred by DNOs. Information on the extent of these has been sought by NGD from its service provider.

c) Whether it is appropriate to recover all or any of the costs and, if so, a proposal for the most appropriate way for these costs to be recovered:

No additional cost recovery is proposed.

- d) **The consequence (if any) on the level of contractual risk of each Transporter under the Uniform Network Code of the Individual Network Codes proposed to be modified by this Modification Proposal**

No such consequences have been identified.

- 5 **The extent to which the implementation is required to enable each Transporter to facilitate compliance with a safety notice from the Health and Safety Executive pursuant to Standard Condition A11 (14) (Transporters Only)**

Implementation is not required to facilitate such compliance.

- 6 **The development implications and other implications for the UK Link System of the Transporter, related computer systems of each Transporter and related computer systems of Users**

Data service provision is provided via the Transporter's agent's Internet Access to Data (IAD) platform. It is necessary to partition IAD by Supplier to ensure the Supplier is only able to view data pertinent to itself/its customers. This would be essential to avoid a Supplier viewing the information of another Supplier which has the same Shipper.

NGD has sought the costs of enhancement which are not expected to be significant.

- 7 **The implications for Users of implementing the Modification Proposal, including:**

- a) **The administrative and operational implications (including impact upon manual processes and procedures)**

No such implications are identified.

- b) **The development and capital cost and operating cost implications**

No such implications are identified.

- c) **The consequence (if any) on the level of contractual risk of Users under the Uniform Network Code of the Individual Network Codes proposed to be modified by this Modification Proposal**

No such consequences are identified.

- 8 **The implications of the implementation for other relevant persons (including, but without limitation, Users, Connected System Operators, Consumers, Terminal Operators, Storage Operators, Suppliers and producers and, to the extent not so otherwise addressed, any Non-Code Party)**

Facilitates compliance by DNOs with SPAA Schedule 23 enabling the provision of change of supplier related data to Suppliers.

9 Consequences on the legislative and regulatory obligations and contractual relationships of the Transporters

Facilitates compliance by DNOs with GT Licence SSC A31 and meets the requirements of Section 105 of the Utilities Act.

10 Analysis of any advantages or disadvantages of implementation of the Modification Proposal not otherwise identified in paragraphs 2 to 9 above

Advantages

- Enables DNOs to comply with Schedule 23 of SPAA.

Disadvantages

No disadvantages have been identified.

11 Summary of representations received as a result of consultation by the Proposer (to the extent that the import of those representations are not reflected elsewhere in this Proposal)

Not applicable.

12 Detail of all other representations received and considered by the Proposer

Not applicable.

13 Any other matter the Proposer considers needs to be addressed

No other matters have been identified.

14 Recommendations on the time scale for the implementation of the whole or any part of this Modification Proposal

Implementation timescales for this Modification Proposal are contingent on the timing of relevant systems changes (see above).

15 Comments on Suggested Text

Not applicable.

16 Suggested Text

No suggested text is identified.

Code Concerned, sections and paragraphs

Uniform Network Code

Transportation Principal Document

Section(s) V5

Proposer's Representative

Chris Warner (National Grid Distribution)

Proposer

Chris Warner (National Grid Distribution)

Appendix 1

Schedule 23

**Supply Point Administration
Agreement**

**Mandatory Schedule for Transporters and
Suppliers**

**Provision and Utilisation of Single Centralised
Online Gas Enquiry Service
(SCOGES) and other Supply Point Information
Services**

Section 6.3

Data Item	Description & Notes	Requirement Priority
MPRN	Unique identifier for a point at which a meter is, has been, or, will be connected to the gas network	Mandatory
Meter Point Address & Postcode	The address that relates to the Meter Point	Mandatory
Meter Serial Number	Manufacturer's Serial Number for the meter	Conditional
LDZ ID	Reference code for the Local Distribution Zone	Mandatory

Section 6.4

1st Level 1 (Returned to user as a search result)

Data Item	Description & Notes	Requirement Priority
MPRN	Unique identifier for a point at which a meter is, has been, or, will be connected to the gas network	Mandatory
Address & Postcode	The address that relates to the entered Meter Point	Mandatory
Meter Serial Number	Manufacturer's Serial Number for the meter	Conditional
LDZ ID	Reference code for the Local Distribution Zone	Mandatory
Gas Act Owner	Indicating Gas Act Owner of the asset	Conditional
MAM ID	Identification of the Meter Asset Manager responsible	Conditional
[Market] Designation	Identifies whether the site is domestic or industrial and commercial, as defined by the supplier	Mandatory

2nd Level 1 (Returned to user after selection of an MPRN) - Larger Transporter Sites only

Data Item	Description & Notes	Requirement Priority
Transition Meter Point	Indicates whether this Meter Point is currently in the process of transferring LDZ	Mandatory
[Meter Point] Status	The status of the Meter Point, e.g. Live, Capped, etc	Mandatory
Meter Type	The type of meter fitted at the Meter Point, Rotary, Synthetic Diaphragm...	Conditional
Meter Capacity	The maximum amount of gas that can be passed through the meter	Conditional
Number of Dials	The number of dials or digits present on the meter	Conditional
Imperial Indicator	Indicates whether the meter measures the volume of gas in imperial or metric units	Conditional
Current Supplier	The identity of the current supplier for the meter point, where applicable	Conditional
Incoming Supplier	The identity of the incoming supplier for the meter point, where applicable.	Conditional

Section 6.5

Data Item	Description & Notes	Requirement Priority
MAM ID	Identification of the Meter Asset Manager responsible	Conditional
Aggregated Meter	Identifies if the Meter Point forms part of a multiple Meter Point Supply Point: aggregation	Mandatory
MPAQ	Annual Quantity of the Meter Point in kWh	Mandatory
Link Code	Defines the functional relationship between meters, i.e. Prime, Sub, Freestanding...	Mandatory
Gas Nomination Type	A code to indicate which portion of the Supply Point the Meter Point belongs: DM or NDM	Mandatory
Supply Type	A code which identifies whether the gas is to be delivered Firm or Interruptible	Mandatory
Reading Frequency	The Frequency that Shippers define to read all the meters on Non Daily Metered (NDM) Meter Points in the Supply Point	Mandatory
Bypass Fitted	Indicates whether a bypass is fitted to the Meter	Mandatory
Latest Reading Date	Date of the last meter reading	Mandatory
Latest Reading	Latest read from the meter	Mandatory
Reading Type	Read type of the latest meter read, i.e. Normal, Customer...	Mandatory
Previous Supplier	Name of supplier who previously owned the Supply Point	Mandatory
Supply Point Number	A unique system generated number that identifies the meter point configuration on UK Link	Mandatory
Confirmation Effective Date	Date on which Ownership of the Supply Point became effective	Mandatory
Confirmation Reference Number	A sequential number that uniquely identified the Confirmation	Mandatory
Shipper	Name of the organisation responsible for the supply point	Mandatory
Annual Quantity - NDM	Annual Quantity for the NDM portion of the Supply Point	Mandatory
End User Category	A unique reference for the End User Category (EUCs are used in the definition of the estimated peak daily load for NDM supply points)	Mandatory
Standard Offtake	The maximum rate of gas flow per day (measured in kWh), for	Mandatory
Quantity – NDM	the NDM portion of the Supply Point	
Exit Zone	The relevant code for the Exit Zone of the Supply Point	Mandatory
Bottom_Stop_SOQ	The minimum acceptable rate of gas flow for the DM portion of the Supply Point on an individual gas day (kWh)	Mandatory
Device Type	The meter type, i.e. Rotary, Synthetic Diaphragm...	Mandatory
Fitted Date	Date meter was physically fitted	Mandatory
Manufacturer	Name of organisation who manufactured the meter	Mandatory
Model	The model type of the meter	Mandatory
Units	The units applicable to the meter read	Mandatory
Correction Factor	The correction factor that needs to be applied to meter reads	Mandatory
Year of Manufacture	The year of manufacture for the Meter	Mandatory
Device Status	The current status of the meter, i.e. Live, Removed...	Mandatory
Location	The location of the meter	Mandatory