

Development Workgroup Report
Extension of DM service to enable Consumer Demand Side Management
Modification Reference Number 0088

Version 1.0

This Development Work Group Report has been prepared by Group Members and follows the format required by the UNC Modification Rules. The Group considered the merits of the Proposal and implementation options, including the elective regime provided by the Transporters as a monopoly service at the moment.

The Group believes that the Report below meets the remit to provide a Report on the potential way forward, but that further consideration would be needed to develop detailed business rules, legal text and an associated implementation plan. In light of the uncertainties around the value of both the costs and benefits of implementing the Proposal, the Group also believe that it would be appropriate for a cost benefit analysis to be undertaken such that all parties would be able to contribute to a full assessment of the merits of the Proposal. This may be best conducted by Ofgem in the form of a Regulatory Impact Assessment.

The Group recommends that the Modification Panel determines that the Proposal should now proceed to the Consultation Phase, however with circulation of the Draft Modification Report delayed until a high level cost estimate is available from the Transporters.

1. The Modification Proposal

Over the last twelve months prospective and current Meter Asset Managers (MAMs) have started to offer Automated Meter Reading Services (AMRS) to Industrial and Commercial Suppliers. One of the perceived advantages of AMR Meters is that it enables Industrial and Commercial Customers to actively manage their gas consumption in response to market signals, particularly in times of system stress.

At present we believe that the current market structure, in particular system limitations, inhibits the development of consumer driven demand management and hence reduces the benefits of smart metering.

At present any Large Supply Point can become a DM site, subject to Transporter approval. In the ten years in which this has been possible few, if any, sites have taken advantage of this facility. We conclude this is due to the fact that the costs and complexity of moving to such a regime outweigh the contractual and commercial benefits of such of a reclassification.

We are proposing that the UNC, with supporting systems, are modified to enable Shippers to manage DM(AMR) Supply Points directly. Any systems changes should be undertaken to allow Shippers to collect and submit daily meter readings to the Transporter's Agent (xoserve). In order to ensure that customers are attracted to such a change the regime for DM(AMR) sites must be proportionate. Transporters and Shippers have been comfortable with such sites being subject to the NDM process since the inception of the Gas Code. It does not seem appropriate that such sites should be subject to an onerous regime akin to the DM process.

We do not anticipate removing any obligations from Transporters in maintaining and operating the current DM portfolio at present.

Consequence of non-implementation

If the modification is not implemented, the advantages which can be conferred by AMR technology, such as facilitating demand side response from mid-sized I&C sites and improving energy efficiency will not be realised and the market will not as readily adopt this technology.

Appendix 1: Business Rules

1.0 SPA Process

- 1.1. When the User makes a Supply Point Nomination, the User must specify an effective Supply Point Registration Date at least 8 Business Days after acceptance of the Supply Point Offer.
- 1.2. At the Supply Point Registration Date, the site is designated as a DM(AMR) site within Sites and Meters.
- 1.3. Shippers will be responsible for the nomination/confirmation and maintenance of any DM(AMR) sites that it chooses to designate as such.
- 1.4. Site must have DM(AMR) equipment installed. This is defined as any site that has Remote Metering Reading Equipment, and is a Larger Supply Point.
- 1.5. Shippers will be not required to install dataloggers (though the Remote Metering Reading Equipment may be capable of acting as a datalogger) or telephone lines.
- 1.6. The Transporter's agent will assign a unique reference number to each set of DM(AMR) Remote Meter Reading Equipment installed. The Shipper will provide any information deemed necessary to facilitate this process.
- 1.7. If the Site has previously not been registered, then the Shipper will supply the AQ for that site as well as an SOQ.
- 1.8. Transporters shall not verify applications outside of the normal process.
- 1.9. No meters placed on a prime or sub-deduct network will be eligible to become DM(AMR), unless the site has a Primary DM Meter, or all sub-deduct meters are reclassified as DM(AMR) meters with the same Supply Point Registration Date.

2.0 Demand Forecast Process

- 2.1. Shippers will submit the forecasted gas requirements for each DM(AMR) site. The nomination timescales will be aligned with current DM sites.
- 2.2. Shippers will submit nominations for DM(AMR) sites with DM sites.
- 2.3. Energy balancing charges will be calculated in accordance with the current DM regime.
- 2.4. Sites may be re-nominated in accordance with the DM timescales.

3.0 Submission of Meter Readings

- 3.1. Reads can be submitted by Shippers or individuals designated by the Shipper as acting on behalf of that site. The Shipper may only submit one set of meter reading files per day for DM(AMR) sites.
- 3.2. As the majority of these sites are currently monthly read NDM sites it seems appropriate that Shippers are required to submit two consecutive reads at least once every 4 calendar months, and must submit at least two consecutive reads every calendar month for at least 90% of the DM(AMR) meters for which it is responsible. (This is identical to the current must read rules for such sites who are monthly read sites).
- 3.3. Shippers will use Best Endeavours to procure daily reads for each DM(AMR) sites.
- 3.4. Xoserve will publish a monthly report (with Shipper anonymity) detailing the number and percentage of DM(AMR) meter reads what were submitted on a daily basis.
- 3.5. If a User fails to satisfy these requirements then the Transporter will procure a meter reading and the User will pay the costs incurred for procuring that read.
- 3.6. If a Supply Point exceeds its maximum Supply Point Capacity it will be subject to ratchet and overrun charges.
- 3.7. When a Shipper submits an SOQ to xoserve as part of the confirmation process, it shall be liable for ratchet charges only if the SOQ submitted is less than the SOQ of that site, prior to it becoming a DM (AMR). This exemption will only be in place for the period where the site has not been classified as a DM(AMR) for a full Gas Year.
- 3.8. Once the provisional period has expired, then the site will be liable for Supply Point Ratchet Charges.
- 3.9. A site will have its AQ derived from two meter readings 12 calendar months separate. If no meter reading is available for the applicable days, then the Transporter's agent may use any two meter readings no more than 13 and no less than 11 months separate. If still no suitable meter reading are available the previous AQ will be used.
- 3.10. The usual start point for AQ derivation will be the Supply Point Registration Date.

4.0 Demand Derivation Process

- 4.1. Shippers will be able to submit one set of metered readings per MPRN registered as a DM(AMR) each Gas Day.
- 4.2. The allocation timescales will be aligned with that of DM sites.

- 4.3. Shippers will be able to adjust erroneous or derived meter readings up to D+5 as under the existing UNC.
- 4.4. If there are insufficient meter readings supplied for a DM(AMR) site, xoserve will calculate a default value for that site.
- 4.5. This default value will be the values used for deriving the metered volume for that site at D-7.
- 4.6. If no Meter Reading is available for derivation, then the metered consumption will be 1/365th of the submitted AQ.

5.0 Reconciliation Process

- 5.1. The reconciliation process will act in the same manner as the Daily Meter reconciliation (EBAs) process.
- 5.2. When a meter reading is submitted to the Transporter agent, meter point reconciliation will be undertaken if insufficient meter readings were submitted the previous day.
- 5.3. When a Shipper submits a read to xoserve that can be verified as a Meter Reading derived from visual inspection and the variance between this meter reading and the system meter reading exceeds 50,000 kWh then a resynchronization reconciliation will be undertaken.
- 5.4. The Shipper may request a resynchronization reconciliation if it has evidence from visual inspection of a misallocation of energy.
- 5.5. Any invoices that are created as a result of this reconciliation will be settled by the incumbent User at the time of the reconciliation.
- 5.6. A resynchronization reconciliation will cover the period between the date of the new meter reading submission and the date of the last resynchronization reconciliation, or if this is unavailable the date of the submission of the opening meter read.

2. Extent to which implementation of the proposed modification would better facilitate the relevant objectives

Allowing Consumers the ability to actively manage their gas consumption, thereby aiding Transporters in their management of the pipeline network on peak demand days, allows this modification to facilitate the achievement of the relevant objectives:

All(a) the efficient and economic operation of the pipe-line system;

Implementation of the Proposal would provide Shippers with an opportunity to provide the Transporters with additional meter readings. This enhanced

information will help inform the Transporters about system demand, facilitating efficient and economic operation of both the NTS and DN pipe-line systems. Transporters were concerned, however, that there would be an impact on demand modelling for the remaining NDM population which could offset any benefit.

Furthermore, implementation of the Proposal would enable DM(AMR) customers to undertake demand-side reduction as actual consumption could be recorded on days when flow is curtailed, so reducing demand upon the system at times of stress. This should aid efficient and economic operation of the pipe-line system, potentially reducing the role of the residual balancer.

All(c), the efficient discharge of the licensee's obligations under this licence;

The Transporters are required to develop their systems in order to ensure that all firm customers are supplied except in a situation where demand is greater than that expected in 1 year in 20. Implementation of the Proposal would facilitate an increase in the number of daily meter readings submitted and potentially promote a higher level of demand-side response when required to balance the system.

It was argued in the Work Group that this may lead to a reduced peak demand forecast which could facilitate efficient investment by the Transporters. However, Transporters did not believe it would be reasonable to anticipate a reliable short term impact on 1 in 20 peak demand on their networks as a result of implementing this Proposal and hence did not believe implementation would better facilitate this objective in this respect.

All(d) the 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;

The Work Group believes that Suppliers do not currently allow potential DM(AMR) customers' variation in demand to be reflected in their supply contract because the benefits of variations in daily consumption cannot be taken into account without becoming an elective DM site. Implementing the Proposal would allow DM(AMR) sites to have such flexibility and benefit from demand variation without the cost and complexity of being classified as a DM site. This would enhance the market, release gas to the market at an earlier stage than otherwise, encourage Shippers to self balance rather than rely on the residual balancer and improve cost reflectivity for sites electing DM(AMR) status, thereby promoting competition.

The Work Group agreed that implementation of this Proposal would, by increasing the number of meter readings provided to the Transporters, result in improved data quality. However, it was pointed out that in statistical terms the NDM EUC profiles for the largest supply points are established on the basis of relatively small samples. This is notwithstanding the fact that daily read data is already collected for the majority of the underlying population. Increasing the

number of daily read sites would further reduce NDM sample sizes and would not yield any additional reads which relate to the remaining NDM load. It would be inappropriate, for example, to assume that consumption patterns for the DM(AMR) sites would reflect that of the NDM sites as a result of heterogeneity and selection bias. Hence no increase in accuracy for the remaining NDM population could be anticipated and, indeed, some degradation might be anticipated. There may also be a loss of ability to profile by LDZ, further reducing accuracy, if significant numbers elect for DM(AMR) status.

All(f) so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of...the uniform network code.

Transporters and Shippers would be likely to incur additional costs in order to implement this Proposal. Neither systems nor operating costs have been established at this stage, although Transporters believe development costs would be substantial, and would need to be considered in order to conclude whether implementation of this Proposal would be consistent with facilitating this relevant objective. The Proposer believes, however, that the Proposal has been developed in light of comments and points raised with a view to containing the likely level of costs which would be incurred. The Work Group agreed that there could be merits in Ofgem undertaking an Impact Assessment which looks at the full range of costs and benefits, beyond the confines of the UNC, associated with implementation of this Proposal.

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

The Work Group believes that implementation of the Modification Proposal would improve the Transporters' ability to manage the network as customers would be more likely to curtail consumption in response to market signals.

Increasing the level of demand side response that Shippers can access from their customers would be expected to improve their ability to balance their own portfolios while continuing to meet the demands of domestic customers. Implementation of this Proposal would give Shippers additional tools to assist with reducing their own customers' demands, therefore reducing the likelihood that a gas deficit emergency will occur and improving security of supply.

By improving Shippers' ability to balance, a reduction in the role of the residual balancer could be expected. This may provide benefits for operation of the total System.

There should be no adverse impact on industry fragmentation as a result of implementing this Modification Proposal.

4. The implications for Transporters and each Transporter of implementing the Modification Proposal, including

a) implications for operation of the System:

Transporters could have access to greater levels of daily consumption information, which may assist with efficient operation of the system. Shippers would be better able to balance their own portfolios through accessing demand reduction from a greater number of customers, thereby reducing the role of the residual balancer.

b) development and capital cost and operating cost implications:

There would be significant costs incurred in modifying and scaling UK Link Systems, for example as it would be necessary to create a new category of site, create SPA nominations, default allocations, establish a new interface or file flow, establish AQS, invoice, etc. At present it is unknown what the level of these costs would be. However, the Work Group believed that the systems solution developed should take account of the costs of alternatives. Transporter members believed that detailed cost estimates cannot be provided until detailed requirements have been finalised.

c) extent to which it is appropriate to recover the costs, and proposal for the most appropriate way to recover the costs:

The Work Group considered that the method of recovery is partially dependent on the level of costs and the exact method of implementation, which are unknown. However, it is proposed that any costs should aim to be recovered through the established price control review or Class 3 UK Link change processes.

d) analysis of the consequences (if any) this proposal would have on price regulation:

Should the Proposal be implemented, the Transporters would expect to consider whether it would be appropriate to modify their Charging Methodologies in order to better reflect costs incurred. Shippers do not believe it is possible to judge this at this stage, when costs are unknown, whether or not implementation would have consequences for price regulation.

5. The consequence of implementing the Modification Proposal on the level of contractual risk of each Transporter under the Code as modified by the Modification Proposal

It is unlikely that there would be any significant increase in the level of contractual risk of each Transporter under the Code as modified by the Modification Proposal. However, any consequent reduction in the number of supply points in particular EUC bands would increase the risk that the Transporters may be unable to fully meet their obligations with respect to the production of NDM profiles for the remaining NDM population as specified in Section H of the UNC (TPD).

The Transporters believe that, without Shipper obligations to provide a regular Meter read, they would face increased contractual risk with respect to Must Reads.

6. The high level indication of the areas of the UK Link System likely to be affected, together with the development implications and other implications for the UK Link Systems and related computer systems of each Transporter and Users

The whole UK Link suite would potentially be impacted to a greater or lesser extent, for example (but not exhaustively):

- SPA (Nomination, confirmation, reconfirmation, AQ process)
- Sites & Meters (recognising site type)
- Invoicing
- Reconciliation

All Users would need to manage any revised file formats, and those availing themselves of the service the increased interfaces and be in a position to manage their customer portfolio more actively.

7. The implications of implementing the Modification Proposal for Users, including administrative and operational costs and level of contractual risk

If revised file formats are involved as part of the solution, all Users may incur additional administrative and operational costs. However, there may be no significant increase if a Shipper decides not to take advantage of the options which would be presented by this Modification Proposal. Shippers may incur significant additional costs if they choose to utilise the ability to submit daily reads on behalf of their customers, but would only be expected to do this if they believed the benefits to themselves would exceed the costs.

Transporters were concerned that implementation of the Proposal could be expected to increase contractual risk for Users to the extent that the additional processes may provide an opportunity for some Users to be selective about the Meter Reads they submit. This is mitigated by the level of transparency provided by the proposed monthly reporting. Users believed that the risk of inappropriate behaviour was low, and the proposed processes would reduce contractual risk relative to the existing position.

8. The implications of implementing the Modification Proposal for Terminal Operators, Consumers, Connected System Operators, Suppliers, producers and, any Non Code Party

If the Proposal were implemented, Suppliers may be in a better position to sell flexible contracts to customers based on daily metering. Additional consumers, especially those with contracts related to the daily gas price, would be able to be incentivised to respond to market signals. Some consumers may also wish to use AMR technology to deliver other benefits, for example demonstrating relative gas consumption between sites on a daily basis, and the benefits flowing from

the Proposal may increase the number of customers for whom AMR is cost effective.

9. Consequences on the legislative and regulatory obligations and contractual relationships of each Transporter and each User and Non Code Party of implementing the Modification Proposal

The Work Group did not identify any consequences on the legislative and regulatory obligations and contractual relationships of each Transporter and each User and Non Code Party of implementing the Modification Proposal.

10. Analysis of any advantages or disadvantages of implementation of the Modification Proposal

Advantages:

- Improves Shippers' ability to balance their positions, potentially reducing the role of the residual balancer
- Potentially increases the volume and flexibility of demand side response, and so to this extent would enhance security of supply
- Increases the consumption information Shippers are able to submit to Transporters, supporting processes such as AQ derivation and reconciliation
- Facilitates the introduction of more flexible contracts into the competitive supply market
- Facilitates the introduction of new approaches to collecting meter reads

Disadvantages:

- Significant system development would be required
- System Development Costs would be incurred
- Some of the benefits could be introduced outside the UNC should Shippers and Suppliers wish to offer such services
- Demand for the service, providing a signal that investment may be justified, has not yet been demonstrated
- Existing NDM processes may be adversely impacted, having a deleterious impact on all NDM loads, e.g. RbD Reconciliation, EUC profiles and Load factors

11. Summary of representations received and considered by the Work Group (to the extent that the import of those representations are not reflected elsewhere in the Work Group Report)

Representations have been received from Ineos Chlor and RWE.

Ineos Chlor "believe that if Demand Response is needed then it is essential that arrangements are in place which ensure this is delivered in the most efficient

way. To enable this it is essential that as many consumers as possible are able to provide response to increase the efficiency of such response.

We consider this modification is an attempt to develop such arrangements by enabling an additional group of customers to provide a response service that are otherwise excluded. We therefore support this proposal.

RWE “believe that whilst this is a relatively simple concept, the solution will prove to be complex, as it will encompass a number of Transporter and Shipper processes. We therefore support the proposer’s recommendation that this matter should be developed through a Work Group”

13. Any other matter the Workgroup considers needs to be addressed

The Work Group consensus was that the Proposal was sufficiently developed to proceed to Consultation but that this should be delayed until high level cost estimates are available.

Other matters which the Work Group considered needed to be addressed were:

Recommend that Ofgem consider undertaking an IA.

System impact assessment required.

Legal Text required.

However Shipper Members believe these do not need to be addressed prior to Consultation as the Proposal has sufficient clarity.

14. Programme for works required as a consequence of implementing the Modification Proposal

To be developed.

14. Proposed implementation timetable (including timetable for any necessary information systems changes)

Though the modification still requires a detailed system impact assessment this will not be forthcoming prior to the consultation stage and is difficult to assess at this point what is an appropriate implementation timetable.

Implementation would need to be discussed at the UK Link Committee.

15. Workgroup's comments on legal text

The Transporter members do not believe they can provide legal text, until detailed Business Rules have been finalised.

16. Text

The Transporters have not provided legal text.

17. Work Group recommendation regarding implementation of this Modification Proposal

The Group recommends that the Modification Panel determines that the Proposal should now proceed to the Consultation Phase, however with circulation of the Draft Modification Report delayed until a high level cost estimate is available from the Transporters.