

Draft Modification Report
Reconciliation following AQ Amendment, SSP becoming LSP following inter
process amendment of AQ
Modification Reference Number 0096

Version 1.0

This Draft Modification Report is made pursuant to Rule 7.3 of the Modification Rules and follows the format required under Rule 9.6.

1. The Modification Proposal

Modification Proposal 640 was implemented in June 2004 and introduced arrangements to reconcile the energy, and transportation commodity charges, where the revision of the Annual Quantity (AQ) had caused the Supply Point to be re-classified as a Larger Supply Point (LSP). The Modification Proposal (640) contained a number of exclusions in order to simplify the amendment. These exclusions were considered, at the time, to be of little significance and of low materiality. However, it is now apparent from figures made available by [xoserve at a Billing Operations Forum] that this is not the case.

These exclusions are contained within Paragraph 7.4.3 of Section E

"7.4.3 Where, as a result of the revision of the Annual Quantity of a Smaller Supply Point pursuant to Section G1.6, the Supply Point becomes a Larger Supply Point and:-

- (a) the Annual Quantity is increased by more than:-
 - (i) 20% of the Annual Quantity at the start of the preceding Gas Year; and at least by
 - (ii) 15,000 kWh; and
- (b) there has not been a change in Registered User for the Supply Point since the last revision of the Annual Quantity of the Supply Point pursuant to Section G1.6; and
- (c) the Annual Quantity of the Supply Point was not increased such that the Smaller Supply Point became a Larger Supply Point prior to the Provisional Annual Quantity being calculated by the Transporter

then paragraph 7.4.4 will apply."

This Modification Proposal seeks to remove the exclusion contained at 7.4.3 (c) and would therefore allow the reconciliation of all Larger Supply Points (LSPs) which were previously Smaller Supply Points (SSPs) prior to the AQ revision, regardless of the fact that an amendment of the AQ may have taken place since the previous annual process.

Consequence of not making this change

Significant amounts of energy will continue to be allocated to the incorrect sector, i.e. that this will be allocated in aggregate across SSPs rather than correctly applied to the LSP sector. Please see Appendix for assessment of impact.

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

By ensuring the correct allocation of energy and transportation commodity charges following revision of Annual Quantities, implementation of this Modification Proposal would further cost reflectivity and so further achievement of the relevant objectives as defined in SSC A11 of the Gas Transporters Licence as follows:-

- (d) so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition:
 - (i) between relevant shippers
 - (ii) between relevant suppliers

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

The implementation of this proposal should not have any effect on security of supply, operation of the Total System, or industry fragmentation.

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

a) implications for operation of the System:

No implications for operation of the system have been identified.

b) development and capital cost and operating cost implications:

No development and capital cost and operating cost implications have been identified.

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

No cost recovery mechanism is proposed.

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

No such consequences on price regulation have been identified.

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

No such consequences have been identified.

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

No systems implications have been identified.

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

No such implications have been identified.

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

No such implications have been identified.

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

No such consequences have been identified.

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

Advantages

- ensures the correct allocation of energy and transportation commodity charges following revision of Annual Quantities

Disadvantages

- none identified

11. Summary of representations received (to the extent that the import of those representations are not reflected elsewhere in the Modification Report)

Written Representations are now sought in respect of this Draft Report

12. The extent to which the implementation is required to enable each Transporter to facilitate compliance with safety or other legislation

Implementation is not required to enable each Transporter to facilitate compliance with safety or other legislation.

13. The extent to which the implementation is required having regard to any proposed change in the methodology established under paragraph 5 of Condition A4 or the statement furnished by each Transporter under paragraph 1 of Condition 4 of the Transporter's Licence

Implementation is not required having regard to any proposed change in the methodology established under paragraph 5 of Condition A4 or the statement furnished by each Transporter under paragraph 1 of Condition 4 of the Transporter's Licence.

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

No programme of works would be required as a consequence of implementing the Modification Proposal.

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

Implementation can be immediate on receipt of direction from Ofgem.

16. Implications of implementing this Modification Proposal upon existing Code Standards of Service

No implications of implementing this Modification Proposal upon existing Code Standards of Service have been identified.

17. Recommendation regarding implementation of this Modification Proposal and the number of votes of the Modification Panel

19. Text

TRANSPORTATION PRINCIPAL DOCUMENT

SECTION E – Daily Quantities, Imbalances and Reconciliation

Paragraph 7.4.3.(b) after `pursuant to Section G1.6` delete `and`

Delete paragraph 7.4.3 (c)

Representations are now sought in respect of this Draft Report and prior to the Transporters finalising the Report

Subject Matter Expert sign off:

I confirm that I have prepared this modification report in accordance with the Modification Rules.

Signature:

Date :

Signed for and on behalf of Relevant Gas Transporters:

Tim Davis
Chief Executive, Joint Office of Gas Transporters

Signature:

Date :