

CODE MODIFICATION PROPOSAL No xxxx
Extending Rights to Protected Information Provisions for Meter Asset Managers /
Registered Metering Applicants
Version 0.1 Draft

Date: 11/02/2010

Proposed Implementation Date: 06:00 on the day after Authority Decision.

Urgency: Non Urgent

1 Nature and Purpose of Proposal (including consequence of non implementation)

Transporters are currently permitted to disclose a limited amount of data relating to a Supply Point to Meter Asset Manager (MAM) organisations. UNC TPD Section V5.11.1 permits Transporters to provide the identity of the Supplier at a Supply Point to the Registered Metering Applicant (RMA) on request and this request is regarded as having been made on behalf of the Registered User at the Supply Point. The Transporters' Agency regularly receives requests from MAMs requesting the identity of the Supplier at a Supply Point to allow successful communication between the MAM and the Supplier to instigate and / or conclude commercial discussions relating to the metering at a Supply Point. For information; the Transporters' Agency maintains a register of RMAs on behalf of the Transporters.

Currently, the Transporters' Agency receives enquiries from MAMs requesting additional information relating to Supply Points. Such requests are currently rejected by the Transporters' Agency as the Protected Information provisions in UNC TPD Section V5 do not permit disclosure. Examples of such information requests relate to:

- Meter Information.
- status of Supply Points (live / dead)
- status of Supply Point confirmation.

The intent of this UNC Modification Proposal is to extend the disclosure of Protected Information provisions to include RMAs beyond the provision of the Supplier identity. For clarity this would be permitted where a RMA is registered at a Supply Point as the MAM in the Supply Point Register or where the RMA is not registered as the MAM, for a period covering where the RMA was registered as the MAM at the Supply Point. The specific data fields available to RMAs at a Supply Point would be specified in a new Annex to UNC TPD Section V, Annex V-[5] in the form of a table (see example Annex V-[5]) on separate document.

Extending the Protected Information provisions in UNC TPD Section V to

RMA's would also align the gas industry information provisions to that of the electricity industry which already provides for Meter Operator and Meter Asset Provider access to central meter asset information via an online information system.¹

Providing access to RMA's to additional Supply Point and Meter Information within the Supply Point Register would facilitate the following benefits:

- provide an additional Meter Information source for MAMs.
- increase certainty of Meter Information resulting in increased confidence in asset investment decisions.
- provide a single industry source of information relating to Meter Information for MAMs and reduce the requirement to make multiple information requests to multiple Suppliers.

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User Pays

a) **Classification of the Proposal as User Pays or not and justification for classification**

As the intent of this Modification Proposal is to enable Transporters to provide additional Protected Information to RMA's there would be no costs associated with the implementation of this Modification Proposal. No UNC User Pays service obligation is being placed on the Transporters through this Modification Proposal. The actual provision of information to RMA's may incur an additional Transporter Agency cost which would be recovered via a non UNC Agency services charge. Hence this UNC Modification has not been classified as a User Pays Modification. The provision of Protected Information may take the form of, but is not limited to reports, digital media or on-line access. Any service provided to RMA's as a result of the implementation of this Modification would require an Agency Charging Statement amendment and approval by the Authority.

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

100% to Registered Metering Applicant.

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

No direct charges are envisaged to Shippers for these services.

d) **Proposed charge for inclusion in ACS – to be completed upon receipt of cost estimate from xoserve**

¹ MRA – Electricity Central Online Enquiry Service MAP 15.

N/A

3 Basis upon which the Proposer considers that it will better facilitate the achievement of the Relevant Objectives, specified in Standard Special Condition A11.1 and 2 of the Gas Transporters Licence

Implementation of this Modification Proposal would better facilitate the following relevant objectives:

(a) the efficient and economic operation of the pipe-line system to which this licence relates;

Implementation would not be expected to better facilitate the achievement of this relevant objective.

(b) So far as consistent with sub-paragraph (a), the coordinated , efficient and economic operation of (i) the combined pipe-line system, and/or (ii) the pipeline system of one or more other relevant gas transporters;

Implementation would not be expected to better facilitate the achievement of this relevant objective.

(c) So far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence;

Implementation would not be expected to better facilitate the achievement of this relevant objective

(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; and/or

Transporter systems are at the centre of numerous gas industry processes and data items are collected, stored and updated on a regular basis by both Transporters, Shippers, Suppliers, Meter Asset Managers (MAMS/RMAs) and other industry organisations. Transporters currently provide Supply Point information services to Shipper Users permitted under the Protected Information provisions detailed in UNC TPD Section V 5.3. Extending the Protected Information provisions under Section V to RMAs would provide the following benefits to RMAs:

- establish the existing type of metering asset at a Supply Point allowing a RMA to more accurately price and invoice its services to a Supplier organisation.
- increase the certainty to RMA organisations of which

assets they currently hold at a Supply Point allowing more accurate and cost reflective billing to Suppliers for metering services.

- reduce the number queries between RMAs and multiple Suppliers as to the nature of metering assets at Supply Points.

The benefits detailed above will better facilitate competition between relevant Suppliers by allowing more accurate and cost reflective RMA charging to Suppliers.

(iii) between DN Operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant Shippers;

(d) So far as is consistent with sub-paragraphs (a) to (d), the 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; and

Implementation would not be expected to better facilitate the achievement of this relevant objective.

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

Implementation would not be expected to better facilitate the achievement of this relevant objective

4 **Any further information (Optional), likely impact on systems, processes or procedures, Proposer's view on implementation timescales and suggested text**

Increased information requests from RMAs to the Transporters' Agency is likely to result in increased usage of electronic online information provision services, although the transporter's agency has indicated to the Transporters that future planned replacement systems are likely to be flexible and efficient enough to cope with such impacts.

5 **Code Concerned, sections and paragraphs**

- a) Uniform Network Code
- b) Transportation Principal Document

Section(s) Section V 5

Proposer's Representative

Joel Martin (Scotland Gas Networks)

Proposer

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