CODE MODIFICATION PROPOSAL No xxxx
The provision of a "Data Update" to Non Code Parties
Version 0.3 DRAFT

Date: 17/06/2010

Proposed Implementation Date: TBA

Urgency: Non Urgent

1 The Modification Proposal

a) Nature and Purpose of this Proposal

With changes to Suppliers Licence obligation in respect of Advanced Metering it is increasing clear that there will be a widespread adoption of AMR equipment and processes by the gas industry. Wider adoption will also be driven by the use of AMR to fulfil energy efficiency requirements of environmental schemes such as the CRC and the EU ETS.

To support the roll out of AMR Energy Services & Technology Association (ESTA) have developed an industry Code of Practice (ASPCOP). A number of companies have already signed up to the Scheme and those parties represent the majority of AMR installations undertaken in the UK. As part of the development of the ASPCOP it was recognised that an ASP Hub which would provide information to relevant parties would be beneficial in enabling parties to easily manage Change of Supplier scenarios and avoid Stranding Assets and Multiple Asset installations would enhance efficient market operation.

As well as supporting interoperability It is vital that Suppliers know if and where AMR equipment is attached to meters, who operates each AMR device and the contractual relationship for connected devices. This will allows Shippers and their Suppliers and Service Providers to manage compliance with relevant licence conditions.

It is important to understand that unlike other Assets the provision of AMR Equipment and Data Services may be provided directly to Consumers and that bi lateral contracts may exist for the Consumer to purchase services directly from the AMR provider whilst the Supplier purchases or his Service Provider has in place its own arrangements for accessing data. The Data Hub will provide a common single point for industry participants to access critical information to aid their understanding of the arrangements in place at any particular meter.

While it is not the most efficient scenario it is worth noting that unlike the meterpoint to meter relationship the AMR to meterpoint relationship is not based a one to one premise. Multiple AMR units may be attached to one meterpoint. This scenario is already relatively commonplace. Shippers and Suppliers must be aware of any choice in AMR provider so they can make economic and efficient decisions about which AMR operator to use to provide meter reads.

This information must be available to the Shipper and supplier at the time of quoting the customer for the gas supply contract as it can affect the price offered. As the incumbent supplier is likely to know this information it could be a barrier to competition if this data is not provided.

As this proposal would only relate to provision of Data Items in relation to Industrial & Commercial sites we do not see any issues arising in respect of the Data Protection act and Personal Data.

The Proposal

It is therefore Gazproms proposal to enable the provision of a set of data items to the relevant Service Provider to enable the population of an AMR Data Hub.

While the frequency of the update is subject to further discussion we would envisage a Daily "Data Update" would prove the optimum approach.

The current list of data items we are proposing to be hold in the Hub are set out in the table below. Those items we are proposing to form part of the Data Update are identified in the "Source of Data Item" column as "Data Update"

	Instances per MPRN	Data Item	Description of Data Item	Source of Data Item
1	S	MPRN	The Unique industry reference point	Data Update [from Xoserve]
2	S	MAM ID	The MDD identifier of the MAM	Data Update [from Xoserve]
3	S	Meter Serial Number (MSN)	The Meter Serial number associated with the Meter	Data Update [from Xoserve]
4	S	Meter Install Date	The Date the Meter was installed	Data Update [from Xoserve]

5	S	Meter Removal Date	The Date the Meter was removed	Data Update [from Xoserve]
6	S	Convertor Serial Number (CSN)	The Serial number associated with the Convertor	Data Update [from Xoserve]
7	S	Convertor Install Date	The Date the Convertor was installed	Data Update [from Xoserve]
8	S	Convertor Removal Date	The Date the Convertor was removed	Data Update [from Xoserve]
9	M	ASP ID	The MDD identifier of the ASP	To be populated by relevant ASP
10	M	AMR Serial Number	The AMR Serial Number associated with the AMR	To be populated by relevant ASP
11	M	AMR Install Date	The Date the AMR was installed	To be populated by relevant ASP
12	M	AMR Removal Date	The Date the AMR was removed	To be populated by relevant ASP
13	M	Contract Relationship	Consumer, Supplier, Transporter, None	To be populated by relevant ASP

Note 1: "Instances per MPRN" identifies data items which can occur only Singularly or in Multiple instances. A Meter could have several AMR devices attached to it so the Hub would have to hold multiple instances of AMR devices.

Note 2: The Contract Relationship identified the nature of the "active" relationship between the ASP and the relevant party e.g. the ASP could be providing services to the Consumer and this information would allow the Supplier to potentially contract with the Consumer's ASP for Read Services.

Note 3: ASP ID, AMR Serial Number, AMR Install Date, AMR Removal Date and Contract Relationship are not currently held on existing industry systems.

Gazprom believes the scope of the Data Update, items 1 to 8, is such that the development should not be significant

Gazprom propose that the UNC be modified to allow the Transporters, via the Transporter Agency, to provide a Data Update to Non Code Parties subject to a set of Criteria as set out below: -

1. The Non Code party warrants that the Data Update is being used for legitimate business purposes

2. The Non Code party indemnifies and holds harmless all Code Parties from the consequence of inappropriate use of the Data Update

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

Not Applicable

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.

We believe that as the proposal has been discussed and developed within the Distribution Workstream.

We therefore believe the proposal should proceed to Consultation.

2 User Pays

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

We believe this proposal is not a User Pays proposal as it simply enables the provision of the Data Update

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

Not applicable

We note some costs may be associated with the release of data however these would be born outside Code arrangements

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

Not applicable

We note some costs may be associated with the release of data however these would be born outside Code arrangements

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

Not applicable

We note some costs may be associated with the release of data however these would be born outside Code arrangements

3 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

On its own this proposal would not meet any of the relevant objectives however with the AMR database being developed by ESTA it would facilitate all of the following:

Standard Special Condition A11.1 (a): the efficient and economic operation of the pipe-line system to which this licence relates

Implementation of this proposal would aid the rollout of AMR across the I&C market. The availability of increased numbers and accuracy of AMR reads provided by shippers to GTs would improve their ability to allocate gas effectively.

Standard Special Condition A11.1 (b): so far as is consistent with sub-paragraph

(a), the 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;

Improvements in the accuracy of reads provided by AMR devices would provide more accurate data to the Distribution Networks about demand on their system.

Forecasts of network usage should be more accurate which would allow them to more accurately predict their future and current requirements from the NTS.

Standard Special Condition A11.1 (d): so far as is consistent with subparagraphs

(a) to (c) 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;

This change will ensure at change of supply all potential Shippers and suppliers will know what AMR devices are onsite and the available arrangements for accessing reads. This will facilitate Shippers and Suppliers seeking to compete for the customers, and so facilitate effective competition between suppliers and between shippers.

This change should therefore facilitate an increase the numbers and accuracy of

AMR reads provided by shippers to the GTs. This will improve the accuracy of the invoices for all NDM supply points. The RbD process would be improved through the use of more accurate profiles in invoicing.

By amending terms to allow the change of supply process to work with an increased use of AMR this proposal will assist the provision of a greater number of accurate reads by shippers.

The Modification would therefore aid the correct apportionment of transportation and energy charges thereby facilitate competition between relevant suppliers and relevant shippers.

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

An improvement in the ability of the GTs to manage their networks would be expected due to the improved allocation, profiling and modelling of energy allowed by the provision of AMR meter reading data.

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

a) The implications for operation of the System:

An improvement in the ability of the GTs to manage their networks would be expected due to the improved allocation, profiling and modelling of energy allowed by the provision of AMR meter reading data.

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

None identified.

We note some costs may be associated with the release of data however

these would be born outside Code arrangements

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:

See above

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

None identified

6 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)

From a Safety perspective the ability to access a centralised resource that identifies AMR relationships at MPRN level would help in the event that an AMR device was found to be unsafe. The resource could also be used by MAMs to check MPU compliance

7 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

None identified

8 The implications for Users of implementing the Modification Proposal, including:

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

Access to a central source of information will enhance the efficiency of Suppliers processes in particular around the Change of Supplier process

b) The developmet and capital cost and operating cost implications

None 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

None identified

9 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)

This proposal would help to ensure that AMR providers would have the opportunity to offer meter reads from any site where appropriate equipment is installed.

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

None

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

Advantages

Will help to ensure effective supply competition is maintained when AMR is widespread in the I&C market. Assuming the data will be available to all interested parties this proposal will ensure MAMs can access an accurate record of what AMR devices are at a meterpoint.

Disadvantages

12 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)

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

14 Any other matter the Proposer considers needs to be addressed

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

16 Comments on Suggested Text

17 Suggested Text

Code Concerned, sections and paragraphs

Uniform Network Code

Transportation Principal Document

Section(s)

Proposer's Representative

Steve Mulinganie (Gazprom Marketing & Trading Retail)

Proposer

Steve Mulinganie (Gazprom Marketing & Trading Retail)