

Change Proposal

UNC Modification 0636A - Updating the parameters for the NTS Optional Commodity Charge

Mod Reference: 0636A
CDSP Reference: xrn4606

Document Stage	Version	Date	Author	Status
ROM Request / Change Proposal	0.1	09/02/18	Nick Wye	Draft
ROM Response	0.1	15/02/18	Murray Thomson	Draft
Change Management Committee Outcome				Choose an item.
EQR				Choose an item.
Change Management Committee Outcome				Choose an item.
BER				Choose an item.
Change Management Committee Outcome				Choose an item.
CCR				Choose an item.
Change Management Committee Outcome				Choose an item.

Document Purpose

This document is intended to provide a single view of a change as it moves through the change journey. The document is constructed in a way that enables each section to build upon the details entered in the preceding section. The level of detail is built up in an incremental manner as the project progresses.

The template is aligned to the Change Management Procedures, as defined in the CDSP Service Document. The template is designed to remove the need for duplication of information. Where information is required in one section but has been previously captured in a previous section, the previous section will be referenced.

The summary table on the front page shows the history and the current status of the Change Proposal.

Section	Title	Responsibility
1	Proposed Change	Proposer / Mod Panel
2	ROM Request / Change Proposal	Proposer / Mod Panel
3	ROM Request Rejection	CDSP
4	Rough Order of Magnitude (ROM) Analysis	CDSP
5	Change Proposal: Committee Outcome	Change Management Committee
6	EQR: Change Proposal Rejection	CDSP
7	Evaluation Quotation Report (EQR): Notification of delivery date	CDSP
8	Evaluation Quotation Report (EQR)	CDSP
9	Evaluation Quotation Report (EQR): Committee Outcome	Change Management Committee
10	Business Evaluation Report (BER)	CDSP
11	Business Evaluation Report (BER): Committee Outcome	Change Management Committee
12	Change Completion Report (CCR)	CDSP
13	Change Completion Report (CCR): Committee Outcome	Change Management Committee
14	Document Template Version History	CDSP
Appendix		
A1	Glossary of Key Terms	N/A

Section 1: Proposed Change

This Proposal section has been drafted on Joint Office's behalf by Xoserve and any views expressed in them are the Proposer's (and not Xoserve's).

Note: This is a revised version of the Change Proposal Section, to ensure that the content is seen as the Proposer's view and not Xoserve's neural view of the proposal.

Originator Details			
Drafted and Submitted (on Behalf of Joint Office) By	Nick Wye (Waters Wye) on behalf of Vitol S.A. Geneva (Neil Bashford)	Contact Number	07900 055144
		Email Address	nick@waterswye.co.uk
Customer Representative		Contact Number	
		Email Address	
Subject Matter Expert / Network Lead		Contact Number	
		Email Address	
Customer Class	<input checked="" type="checkbox"/> Shipper <input type="checkbox"/> National Grid Transmission <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> IGT		
Overview of proposed change			

Change Details

Mod 0636A Solution (Section 5)

This alternate proposal to Mod 0636 requires a change to place a new cap on the Distance (D) parameter.

Where the distance between the NTS entry and NTS exit point (route) is greater than 115 km (calculated by National Grid), then the shipper should be excluded from utilising the NTS Optional Commodity Charge (NTS shorthaul tariff).

For the avoidance of doubt;

No other changes are being proposed by 0636A to the existing NTS Optional Commodity Charge (OCC) formula.

The **current** NTS OCC formula is as follows:

$$p/kWh = 1203 \times M^{-0.834} \times D + 363 \times M^{-0.654}$$

Where:

D is the direct distance of the site or non-National Grid NTS Pipeline to the elected Entry Terminal

M is the Maximum NTS Exit Point Offtake Rate (MNEPOR) at the site, converted into kWh/day

^ means 'to the power of..'

The **revised** NTS OCC formula is as follows:

$$p/kWh = 1203 \times M^{-0.834} \times D + 363 \times M^{-0.654}$$

Where:

D is the direct distance of the site or non-National Grid NTS Pipeline to the elected Entry Terminal **and is equal to or, less than 115km**

M is the Maximum NTS Exit Point Offtake Rate (MNEPOR) at the site, converted into kWh/day

^ means 'to the power of..'

The update to D would be effective for all sites availing of the OCC from the time of implementation of the Modification and no further updates are envisaged prior to October 2019.

Notes for further consideration by Xoserve:

1. It is understood that there is currently no validation of OCC distance within Xoserve UK-Link systems (including Gemini) i.e. to prevent shippers from nominating NTS sites for OCC.
2. Transitional arrangements should be considered for those NTS sites that are currently nominated for OCC but are over 115 km. It is anticipated the proposer, National Grid and Xoserve will liaise to establish how such existing NTS sites will be excluded from the OCC process e.g. systems, business process and/or contractual. In particular, Xoserve should consider the possibility of removing all OCC sites, requiring qualifying sites to reapply, as well as the ability to remove OCC sites after 1 October 2018 (or implementation date) if it is apparent that they no longer qualify for OCC as a result of the distance cap.

The Proposer's Reason(s) for the proposed service change	<p>The proposer summarised their reasons for change in the modification as follows...</p> <p>https://www.gasgovernance.co.uk/sites/default/files/ggf/book/2018-01/Modification%200636A%20v1.0_0.pdf</p>
Status of related UNC Mod	<p>0636A is in Workgroup Development. The 0636A (and 0636) Workgroup Reports are required for consideration by the Mod Panel on 15th March 2018</p>
Full title of related UNC Mod	<p>UNC Modification 0636 – Updating the parameters for the NTS Optional Commodity Charge</p>
Benefits of change	<p>See Mod 0636A</p>
Required Change Implementation Date	<p>Anticipated : 2 months after an Ofgem direction to implement 0636A</p>
Please provide an assessment of the priority of this change from the perspective of the industry.	<p> <input checked="" type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low Rationale for assessment: High Impact Mod </p>

Section 2: Initial Assessment / ROM Request / Change Proposal

This ROM Request section has been drafted on Joint Office's behalf by Xoserve and any views expressed in them are the Proposer's (and not Xoserve's).

Note: This is a revised version of the ROM Request Section, to ensure that the content is seen as the Proposer's view and not Xoserve's neural view of the proposal.

Service Level of Quote/Estimate Robustness Requested	Evaluation Services <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> ROM estimate for Analysis and Delivery CDSP Change Services <input type="checkbox"/> Firm Quote for Analysis <input type="checkbox"/> Firm Quote for both Analysis and Delivery
Has any initial assessment been performed in support of this change?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Is this considered to be a Priority Service Change?	<input checked="" type="checkbox"/> Yes (Mod Related) <input type="checkbox"/> Yes (Legislation Change Related) <input type="checkbox"/> No
Is this change considered to relate to a 'restricted class' of customers? Consider if the particular change is only likely to impact those who fall under a particular customer class If it impacts all customer classes (i.e. Transmission, Distribution & Shippers) then choose 'No'.	<input checked="" type="checkbox"/> Yes (please mark the customer class(es) to whom this is restricted) <input type="checkbox"/> No ----- <input checked="" type="checkbox"/> Shippers <input checked="" type="checkbox"/> National Grid Transmission <input type="checkbox"/> Distribution Network Operators <input type="checkbox"/> IGTs
Is it anticipated that the change would have an adverse impact on customers of any other customer classes? Please refer to appendix one for the definition of an 'adverse impact'	<input type="checkbox"/> Yes (please give details) <input checked="" type="checkbox"/> No
General Service Changes Only (please ensure that either A or B below is completed)	
A) Customer view of impacted service area(s)	
N/A	
B) If the change is anticipated to require the creation of a new service area and service line please give further details stating proposed name of new service area and title of service line:	

N/A
Specific Service Changes Only:
Please detail the proposed methodology (or amendment to the existing methodology) for determining Specific Service Change Charges.
N/A
Please detail the proposed basis (that is, Charging Measure and Charging Period) for determining Specific Service Change Charges in respect of the Specific Service.
N/A
Impacts to UK-Link System or File Formats
In addition to introducing a distance cap and associated validation, it is understood there might be a requirement for a new UK-Link Reason Code (SPC/NRF files?) e.g. 'NTS site rejected, distance over 115 km from the NTS entry point'.
Impacts UKL Manual Appendix 5b
Impacts to Gemini System
Please give any other relevant information.

Please send the document to the following:

Recipient	Email
Xoserve Portfolio Office	changeorders@xoserve.com
Change Management Committee Secretary	dsccomms@gasgovernance.co.uk

Section 3: ROM Request Acceptance

Is there sufficient detail within the ROM Request to enable a ROM Analysis to be produced?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If no, please define the additional details that are required.	

If the ROM Request is not accepted. Please forward this document to the Portfolio Office for onward transmission to the Change Management Committee

Section 4: ROM Analysis

This ROM is Xoserve's response to the above Evaluation Service Request. The response is intended to support customer involvement in the development of industry changes. Should the request obtain approval for continuance then a Change Proposal must be raised for any further analysis / development.

Disclaimer:

This ROM Analysis has been prepared in good faith by Xoserve Limited but by its very nature is only able to contain indicative information and estimates (including without limitation those of time, resource and cost) based on the circumstances known to Xoserve at the time of its preparation. Xoserve accordingly makes no representations of accuracy or completeness and any representations as may be implied are expressly excluded (except always for fraudulent misrepresentation).

Where Xoserve becomes aware of any inaccuracies or omissions in, or updates required to, this Report it shall notify the Change Managers Committee as soon as reasonably practicable but Xoserve shall have no liability in respect of any such inaccuracy or omission and any such liability as may be implied by law or otherwise is expressly excluded.

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ROM Analysis

Change Impact:

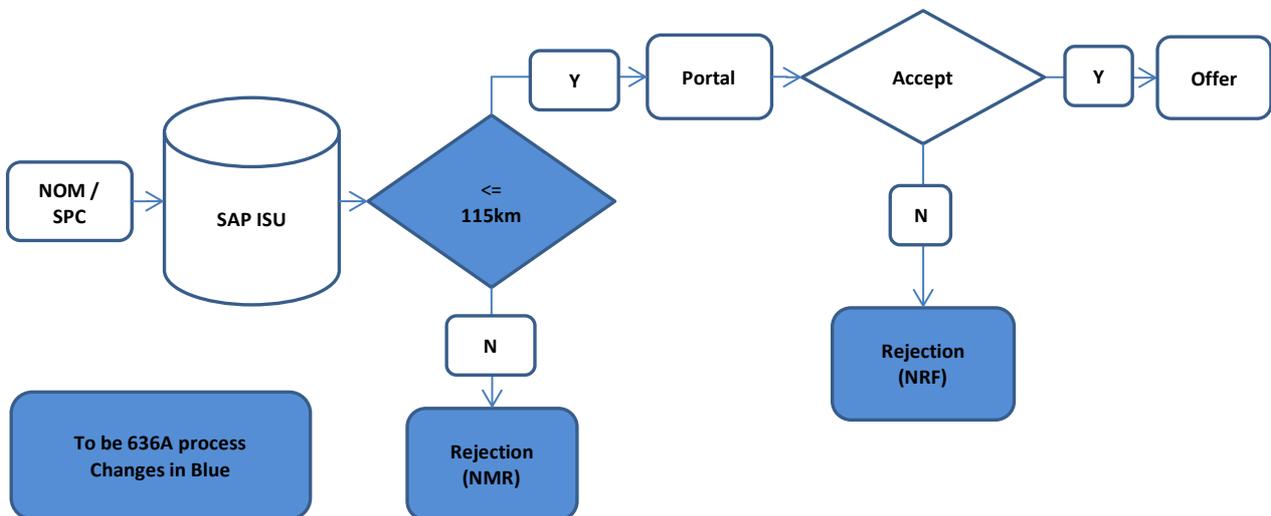
The Optional Commodity Charge (OCC) was introduced in 1998 with the express intention of providing a mitigating option for shippers seeking short distance transportation, and was justified on the basis of avoiding inefficient bypass of the NTS. The OCC has not been updated in nearly 20 years whilst standard commodity charges have risen significantly over the same period, the OCC has become a very attractive option even for exit points that are increasingly distant from an associated entry point.

Introduction of a distance cap, which will be applied in the application of the term “D” in the NTS Optional Commodity Charge Rate formula. Where the distance from the relevant offtake and the specified entry point exceeds this cap, the Optional Commodity Rate cannot be applied. It is proposed that the distance cap is set at 115km.

Potential Solutions

System Solution Option

This option would require an additional validation when NOM and SPC files are received by Xoserve and reject where the Distance is greater than 115km and new rejection code is required. The following shows the changes (in blue that would be required for a system solution).



CDSP Forced Confirmation (>115 km) Solution Option

Where the Shipper User fails to act, then the CDSP are often required to act to (re)confirm Supply Meter Points (SMP). This option would mean any sites outside the distance parameter are excluded at the right time. However, no CDSP functionality exists to (re) confirm Class 1 SMPs and the process would be complicated and have large impacts on CDSP operational teams. This is due to the expected complexity for Class1 SMPs and because of the time allowed for analysis, no costs are available at this time for this process.

Manual Interim solution Option

This Option involves the CDSP Operational teams amending data via system screens and manually creating Gemini work items. Support would be also be required to update SAP tables and analysis for potential system impacts.

Report only Solution

This solution provides a report to National Grid Transmission where SMPs that have requested OCC and ‘D’ is greater than the distance parameter specified (i.e. 115km).

Change Costs (implementation):

The System solution will cost at least **£135k**, but probably not more than **£190k** to develop

The Report Only Solution would cost at least **£4k** but probably not more than **£6.5k** to develop

The Manual Interim Solution would cost at least **£5k** but probably not more than **£10k** to develop

At this time no costs are available for the CDSP Forced Confirmation Solution Option

All above Solution options are discrete.

This change will only Impact DSC BCM Service area 1.

Change Costs (on-going):

- The system solution ongoing costs are likely to be negligible
- The manual interim solution ongoing costs are likely to be at least **£7k** but probably not more than **£13k per annum**
- Adjustment costs applied to Users who don't observe the parameter (Report Only solution).

Timescales:

The strategy adopted for Post Nexus change is a Release strategy (changes grouped and implemented together at a set date) and it is expected that this change would form part of a Release.

Risks

- The Manual Interim solution Option has significant risk of error due to manual nature of the option.
- The Manual Interim solution Option has significant risk because the impacts of manually updating the screens and SAP tables at the same time, whilst possible all the impacts are unknown at this stage.
- In the event that a Shipper User does not observe the distance parameter any adjustments necessary would be complex and would need to be undertaken manually. These costs have not been factored into the Report Only / Manual Interim Solution costs.

Assumptions:

- The System solution should allow the setting of the Distance to be flexible. To allow simple changes in the future.
- The change will affect both NTS and LDZ sites on Optional Commodity charge.
- We note that at the time of writing this ROM there are Transitional Rules in the latest version of the legal text, however because they have not been considered at this time

Dependencies:

- No material dependencies have been identified at this time

Constraints:

- Due to the current change programme it is unlikely that an implementation of the System Solution Option for UNC Modification 0636A is possible before October 2018.

Observations:

There are a number of questions of what to do with the following:

- Inflight SMPs that have OCC
- SMP Offers made but not yet confirmed
- SMPs Confirmed but not yet live

The current system doesn't allow amendments until the site is live ('D'); this may mean that OCC is applied for one day. However, to ensure that Shippers are Nominated and Confirmed correctly and at the right time the CDSP must perform 'Forced' confirmation.

Please note that the General Service Changes Only section in the ROM request implies there is no impact to Services, however changes should be expected.

Please send the document to the following:

Recipient	Email
Xoserve Portfolio Office	changeorders@xoserve.com
Requesting Party	As specified in ROM Request

Section 5: Change Proposal: Committee Outcome

The Change Proposal is approved. An EQR is requested			
Approved Change Proposal version			
The change proposal shall not proceed			
The committee votes to postpone its decision on the Change Proposal until a later meeting		Date of later meeting	
The committee requires the proposer to make updates to the Change Proposal:			
Updates required:			

Section 6: Evaluation Quotation Report (EQR): Change Proposal Rejection

Change Proposal Rejection				
	Yes		No	Is there sufficient detail within the Change Proposal to enable an EQR to be produced? If no, please provide further details below.
Further details required:				

Please send the document to the following:

<i>Recipient</i>	<i>Email</i>
Change Management Committee Secretary	dsccomms@gasgovernance.co.uk

Section 7: Evaluation Quotation Report (EQR): Notification of Delivery Date

Notification of EQR Delivery Date	
Original EQR delivery date:	
Revised EQR delivery date:	
Rationale for revision of delivery date:	

Please send the document to the following:

<i>Recipient</i>	<i>Email</i>
Change Management Committee Secretary	dsccomms@gasgovernance.co.uk

Section 8: Evaluation Quotation Report (EQR)

Project Manager		Contact Number	
		Email Address	
Project Lead		Contact Number	
		Email Address	

Please provide an indicative assessment of the impact of the proposed change on: <ul style="list-style-type: none"> i. CDSP Service Description ii. CDSP Systems 	
Approximate timescale for delivery of 'business evaluation report' (N.b this is from the date on which the EQR is approved.)	
Estimated cost of business evaluation report preparation This can be expressed as a range of costs i.e. 'at least £xx,xxx but probably not more than £xx,xxx'.	
Does the CDSP agree with the 'Restricted class change' assessment (where provided)? Please refer to detail provided in the Change Proposal	<input type="checkbox"/> Yes <input type="checkbox"/> No (please give detail below)
Does the CDSP agree with the 'Adverse Impact' assessment (where provided)? Please refer to detail provided in the Change Proposal	<input type="checkbox"/> Yes <input type="checkbox"/> No (please give detail below)
Does the CDSP agree with the 'Priority Service Change' assessment (where provided)? Please refer to detail provided in the Change Proposal	<input type="checkbox"/> Yes <input type="checkbox"/> No (please give detail below)
General service changes	
Does the CDSP agree with the assessment made in the Change Proposal regarding impacted service areas?	<input type="checkbox"/> Yes <input type="checkbox"/> No (please give detail below)

<p>This should refer to whether the proposing party considers the service change to relate to an existing service area or whether it constitutes a new service area.</p>	
<p>Specific service changes</p>	
<p>Does the CDSP agree with the proposal made in the Change Proposal regarding specific change charges?</p> <p>This should refer to the proposed methodology (or amendment to existing methodology) for determining the specific service charges and the proposed basis for determining the specific service change charges.</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No (please give detail below)</p>
<p>Please provide a draft amendment of the Specific Service Change Charge Annex setting out the methodology for determining Specific Service Change Charges proposed in the Change Proposal</p>	
<p>EQR validity period:</p>	

Please send the document to the following:

Recipient	Email
Change Management Committee Secretary	dsccomms@gasgovernance.co.uk

Section 9: Evaluation Quotation Report: Committee Outcome

The EQR is approved			
Approved EQR version			
The Change Proposal shall not proceed. The Change Proposal and this EQR shall lapse			
The committee votes to postpone its decision on the EQR until a later meeting		Date of later meeting	
The committee requires updates to the EQR:			
Updates required:			
General service changes only			
<i>(The detail upon which the response will be based is originally defined in the change proposal and potentially commented upon in the subsequent EQR)</i>			
1.) Does the committee agree with the assessment of the service area(s) to which the service line belongs and the weighting of the impact?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
2.) If no, please enter the agreed service area(s) and the weighting:			
Specific service changes only			
<i>(The detail upon which the response will be based is originally defined in the Change Proposal and potentially commented upon in the subsequent EQR)</i>			
1.) Please confirm the methodology for the determination of Specific Service Change charges			
2.) Please confirm the charging measure and charging period for the determination of Specific Service Change charges			

Section 10: Business Evaluation Report (BER)

Change Implementation Detail

1.) Detail changes required to the CDSP Service Description

2.) Detail modifications required to UK Link

3.) Detail changes required to appendix 5b of the UK Link Manual

4.) Detail impact on operating procedures and resources of the CDSP

5.) Implementation Plan

6.) Estimated implementation costs

6a.) How will the charging for the costs be allocated to different customer classes?
(General Service Changes only)

Please mark % against each customer class:

National Grid Transmission

Distribution Network Operators and IGT's

DN Operator

IGT's

Shippers

100%

7.) Estimated impact of the service change on service charges

8.) Please detail any pre-requisite activities that must be completed by the customer prior to receiving or being able to request the service.

Implementation Options

Please provide details on any alternative solution/implementation options:

This should include:

- (i) a description of each Implementation Option;
- (ii) the advantages and disadvantages of each option
- (iii) the CDSP preferred Implementation Option

Restricted Class Changes only Is there any change in the view of the CDSP on whether there would be an 'Adverse Impact' on customers outside the relevant customer class(es)?
<input type="checkbox"/> Yes (please give detail below) <input type="checkbox"/> No
Dependencies:
Constraints:
Benefits:
Impacts:
Risks:

Assumptions:
Information Security:
Out of scope:
Please provide any additional information relevant to the proposed service change:

Please send the document to the following:

Recipient	Email
Change Management Committee Secretary	dsccomms@gasgovernance.co.uk

Section 11: Business Evaluation Report: Committee Outcome

The BER is approved and the change can proceed			
Modification Changes Only			
Please ensure that the Transporters are formally informed of the Target Implementation Date			
Approved BER version			
The change proposal shall not proceed and the BER shall lapse			
The committee votes to postpone its decision on the BER until a later meeting		Date of later meeting	
The committee requires updates to the BER:			
Updates required:			

Section 12: Change Completion Report (CCR)

Change Overview			
Please include detail on the following for the chosen implementation option: modifications to UKLink, impact on operating procedures and resources of the CDSP. Actions required of the customer prior to the commencement date			
Please detail any differences between the solution that was implemented and what was defined in the BER.			
Detail the revised text of the CDSP Service Description reflecting the change that has been made			
Were there any revisions to the text of the UK Link Manual?			
<input type="checkbox"/> Yes (please insert the revised text of the UK Link manual below) <input type="checkbox"/> No			
Proposed Commencement Date		Actual Commencement Date	
Please provide an explanation of any variance			
Please detail the main lessons learned from the project			

Service change costs			
Approved Costs (£)		Actual Costs (£)	
Reasons for variance between approved and actual costs:			

Please send the document to the following:

Recipient	Email
Change Management Committee Secretary	enquiries@gasgovernance.co.uk

Section 13: Change Completion Report: Committee Outcome

The implementation is complete and the CCR is approved			
Approved CCR version			
The committee votes to postpone its decision on the CCR until a later meeting		Date of later meeting:	
The committee requires further information			
Further information required:			
The committee considers that the implementation is not complete			
Further action(s) required:			
The proposed changes to the CDSP Service Description or UK Link Manual are not correct			
Amendments to CDSP service description / UKLink manual required:			

Section 14: Document Template Version History

The purpose of this section is to keep a record of the changes to the overall version template and the individual sections within. It will be updated by the CDSP following approval of the template update by the Change Management Committee.

Version History:

Version	Status	Date	Author(s)	Summary of Changes
1.0	Approved		CDSP	Version Approved by Change Committee

--- END OF DOCUMENT ---

Appendix One: Glossary

Term	Definition
Adverse Impact	<p>A Service Change has or would have an Adverse Impact on Customers of a particular Customer Class if:</p> <p>(a) Implementing the Service Change would involve a modification of UK Link which would conflict with the provision of existing Services for which such Customer Class is a Relevant Customer Class;</p> <p>(b) the Service Change would involve the CDSP disclosing Confidential Information relating to such Customers to Customers of another Customer Class or to Third Parties;</p> <p>(c) Implementing the Service Change would conflict to a material extent with the Implementation of another Service Change (for which such Customer Class is a Relevant Customer Class) with an earlier Proposal Date and which remains Current, unless the Service Change is a Priority Service Change which (under the Priority Principles) takes priority over the other Proposed Service Change; or</p> <p>(d) Implementing the Service Change would have an Adverse Interface Impact for such Customers.</p>
General Service	A service provided under the DSC to Customers or Customers of a Customer Class on a uniform basis.
Non-Priority Service Change	A Service Change which is not a Priority Service Change
Priority Service Change	<p>A Modification Service Change;</p> <p>or</p> <p>A Service Change in respect of a Service which allows or facilitates compliance by a Customer or Customers with Law or with any document designated for the purposes of Section 173 of the Energy Act 2004 (including any such Law or document or change thereto which has been announced but not yet made).</p>
Relevant Customer class	A Customer Class is a Relevant Customer Class in relation to a Service or a Service Change where Service Charges made or to be made in respect of such Service, or the Service subject to such Service Change, are or will be payable by Customers of that Customer Class
Restricted Class Change	Where, in relation to a Service Change, not all Customer Classes are Relevant Customer Classes, the Service Change is a Restricted Class Change ;
Service Change	<p>A change to a Service provided under the DSC (not being an Additional Service), including:</p> <p>(i) the addition of a new Service or removal of an existing Service; and</p> <p>(ii) in the case of an existing Service, a change in any feature of the Service specified in the CDSP Service Description, and any related change to the CDSP Service Description</p>
Specific Service	A service (other than Additional Services) available under the DSC to all Customer or Customers of a Customer Class but provided to a particular Customer only upon the order of the Customer.