

## Change Proposal

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

**Mod Reference: 0636C (formally 0636D)**

**CDSP Reference: XRN4631**

Document Stage	Version	Date	Author	Status
ROM Request / Change Proposal	1.0	16/03/18	Mike Ronan (Anghinish Alumina)	Draft
ROM Response	1	28/03/18	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.

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## Section 1: Proposed Change

Originator Details			
<b>Drafted and Submitted on Behalf of (by Joint Office)</b>	Mike Ronan (Aughinish Alumina)	<b>Contact Number</b>	+35361604082 (Eire)
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<b>Customer Representative</b>	Carlo Rossini (Energy-Link)	<b>Contact Number</b>	01738449829
		<b>Email Address</b>	carlo.rossini@energy-link.co.uk
<b>Subject Matter Expert / Network Lead</b>		<b>Contact Number</b>	
		<b>Email Address</b>	
<b>Customer Class</b>	<input checked="" type="checkbox"/> Shipper <input checked="" type="checkbox"/> National Grid Transmission <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> IGT		
<b>Overview of proposed change</b>			

**Change Details**

**1. 0636C alternate proposal:**

It is proposed the **GB-EU Interconnector Points** (Moffat (exit) and **Bacton\*** (entry and exit) **are exempt** (until EU TAR regulation and compliance applies) **from any of the 0636 proposed parameter updates** and will continue to use the existing formula:

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

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.'

\*For the avoidance of doubt, **Bacton** includes **BBL**

**For information:** (0636 ROM response already provided)

**2. 0636 proposed change:**

$$p/kWh = 1247 \times M^{-0.78} \times D + 1422 \times M^{-0.708}$$

Where:

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

**M** is the aggregate of the daily UDQO in kWh/day at the relevant NTS Exit Point from the previous Gas Year divided by the number of days in the previous Gas Year and further divided by 75% except:

- (i) where the site is new and hence there is no flow history, retain the existing formula for M of 24 times the Maximum NTS Exit Point Offtake Rate
- (ii) for an NTS Exit Point in respect of a pipeline interconnector having no physical exit capability, M is the aggregate of the allocated daily energy in kWh/day from the previous Gas Year divided by the number of days in the Gas Year and further divided by 75% to the NTS at the System Entry Point associated with such Connected Delivery Facility.

^ means 'to the power of'.

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

	<p>Thereafter, an annual process would update M each April commencing April 2019 for effect from the following October in the event that this Mod is not superseded by code changes necessary for EU TAR compliance.</p> <p>For the avoidance of doubt:</p> <p>(i) At the time of calculation of the charge rates (which will be subject to the 2 months' notice of charges), the average daily UDQO will take the latest gas year for which data is available –</p> <p>For example, implementation anytime between 1st April and 1st October 2018 will use data from the Gas Year 1<sup>st</sup> October 2016 to 30<sup>th</sup> September 2017.</p> <p>(ii) <math>M = (\Sigma E) / N \times 100 / 75</math> where E is the UDQO for each day of the relevant Gas Year at the NTS exit point and N is the number of days in the relevant Gas Year</p> <p>(iii) The 75% divisor converts an annual daily load to a notional peak day load which determines an appropriate pipe building cost estimate which is then used to derive the unit rate. The value of 75% is consistent with the assumption embedded in the current OCC formula.</p> <p>(iv) A new site ceases to be new if at the annual update it has at least a full Gas Year's UDQO history (even though some UDQO could be zero)</p> <p>(v) M for a seasonal site will have its value calculated in the same way as a non-seasonal site and zero allocation values will be included in the calculation of <math>\Sigma E</math>.</p>
<p><b>The Proposer's Reason(s) for the proposed service change</b></p>	<p>Proposer's Reasons can be found at: <a href="#">Joint Office 0636C</a></p> <p>It is proposed that the changes arising from this code modification be implemented by 1st October 2018 thereby saving up to <b>£223 million</b> in cross subsidies relative to the base case of waiting until October 2019.</p> <p>All GB-EU Interconnector Points to be exempt from these changes until an enduring solution recognising the European Tariff Network Code requirements is implemented as anticipated under Modification Proposal 0621.</p>
<p><b>Status of related UNC Mod</b></p>	<p>In progress – Workgroup Report is required for consideration by the Mod Panel on 12<sup>th</sup> April 2018</p>
<p><b>Full title of related UNC Mod</b></p>	<p><b>UNC Modification 0636 – Updating the parameters for the NTS Optional Commodity Charge</b></p>
<p><b>Benefits of change</b></p>	<p>See Mod</p>
<p><b>Required Change Implementation Date</b></p>	<p>1<sup>st</sup> October 2018</p>
<p><b>Please provide an assessment of the priority of this change from the perspective of the industry.</b></p>	<p><input checked="" type="checkbox"/> High <input type="checkbox"/> Medium</p>

	<input type="checkbox"/> Low Rationale for assessment: High Impact Mod
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## Section 2: Initial Assessment / ROM Request / Change Proposal

<b>Service Level of Quote/Estimate Robustness Requested</b>	<b>Evaluation Services</b> <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> ROM estimate for Analysis and Delivery <b>CDSP Change Services</b> <input type="checkbox"/> Firm Quote for Analysis <input type="checkbox"/> Firm Quote for both Analysis and Delivery
<b>Has any initial assessment been performed in support of this change?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Is this considered to be a Priority Service Change?</b>	<input checked="" type="checkbox"/> Yes (Mod Related) <input type="checkbox"/> Yes (Legislation Change Related) <input type="checkbox"/> No
<b>Is this change considered to relate to a 'restricted class' of customers?</b>  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
<b>Is it anticipated that the change would have an adverse impact on customers of any other customer classes?</b>  Please refer to appendix one for the definition of an 'adverse impact'	<input type="checkbox"/> Yes (please give details) <input checked="" type="checkbox"/> No
<b>General Service Changes Only (please ensure that either A or B below is completed)</b>	
A) Customer view of impacted service area(s)	
This will potentially impact DSC BCM Service Area 7	
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:	

Unknown
<b>Specific Service Changes Only:</b>
Please detail the proposed methodology (or amendment to the existing methodology) for determining Specific Service Change Charges.
Unknown
Please detail the proposed basis (that is, Charging Measure and Charging Period) for determining Specific Service Change Charges in respect of the Specific Service.
Unknown
<b>Impacts to UK-Link System or File Formats</b>
<ol style="list-style-type: none"> <li><b>0636C:</b> Anticipated changes required to hold NTS Optional Commodity rates based on <i>two separate NTS Optional Commodity arrangements</i> (rates) i.e. GB-EU Interconnector points and non-Interconnector points.</li> <li><b>0636:</b> In addition to amending certain fixed values within the Optional Commodity Charge formula, the value currently recorded against 'M' in the charging methodology for the derivation of MNEPOR (Maximum NTS Exit Point Offtake Rate) will be replaced to reflect a new value as determined by the modification proposal solution.</li> </ol>
<b>Impacts UKL Manual Appendix 5b</b>
<b>Impacts to Gemini System</b>
<ol style="list-style-type: none"> <li><b>0636C:</b> Anticipated changes required to hold NTS Optional Commodity rates based on <i>two separate NTS Optional Commodity arrangements</i> (rates) i.e. GB-EU Interconnector points and non-Interconnector points.</li> </ol>
<b>Please give any other relevant information.</b>
Given the timescale for potential implementation (1 <sup>st</sup> October 2018) we kindly request Xoserve considers potential interim (manual workaround) and enduring (system) solutions for 0636C.

Please send the document to the following:

<b>Recipient</b>	<b>Email</b>
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 checked="" 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 Manager's Committee (ChMC) 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 Assessment**

The UNC Modification 0636C (formally 0636D) proposes that the NTS Optional Commodity charge formula where an Option Commodity Charge Route includes an Interconnector Point (Entry or Exit) should be charged using the current formula as follows:

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

All other Option Commodity Charge Routes that do not include an Interconnector Point (Entry or Exit) should be charged using the proposed formula as follows:

$$p/\text{kWh} = 1247 \times M^{-0.78} \times D + 1422 \times M^{-0.708}$$

### **Billing Impacts**

The billing system will require changes to recognise whether to bill for an Interconnector Point or non-Interconnector Points using the separate formulas.

This impacts both Commodity and Reconciliation, with the following impacts:

- Billing configuration changes for 3 new charge type codes (Charge, adjustment and Reconciliation), new price keys, new rates and new rate types.
- Changes to the pre-bill report for the introduction of the new charge codes
- Changes to the PCD templates for the new charge codes

### **SPA Impacts**

The following will be impacted:

- Nominations
- Confirmations
- SSMP Nominations
- SSMP Confirmations
- SAP contract change process
- Gemini work item

### **Gemini system**

Changes are likely to be required to Gemini, these will include:

- Changes to Short Haul charge and Short Haul rebate charge creation process
- Changes to the monthly invoice generation process
- Changes to the Gemini screens that display the charges

**Change Costs (implementation):**

The solution will cost at least £100k, but probably not more than £115k to develop.

An offline interim solution has been considered, however the costs are likely to more than the online system solution and could not be delivered any sooner.

**Change Costs (on-going):** There are annual on-going costs, but these are likely to less than ½ day for 1 FTE per annum.

**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 major Release. Consideration for inclusion in a Release will be made when the Change Proposal is submitted to the Change Management Committee (ChMC).

**Assumptions:**

- LDZ sites will use the nominated DMSOQ value in place of MNEPOR.

**Constraints:**

- A Price change notification would be required.

**Observations:**

- It is likely that SAP BW reports are affected and require changes. However, due to time and resource constraints the number and materiality of reports has not been analysed.

Please send the document to the following:

<b>Recipient</b>	<b>Email</b>
Xoserve Portfolio Office	.box.xoserve.portfolioOffice
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				
	<b>Yes</b>		<b>No</b>	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><b>Recipient</b></i>	<i><b>Email</b></i>
Change Management Committee Secretary	dsccomms@gasgovernance.co.uk

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

<b>Notification of EQR Delivery Date</b>	
Original EQR delivery date:	
Revised EQR delivery date:	
Rationale for revision of delivery date:	

Please send the document to the following:

<b><i>Recipient</i></b>	<b><i>Email</i></b>
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"> <li>i. CDSP Service Description</li> <li>ii. CDSP Systems</li> </ul>	
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)
<b>General service changes</b>	

<p>Does the CDSP agree with the assessment made in the Change Proposal regarding impacted service areas?</p> <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>	<input type="checkbox"/> Yes <input type="checkbox"/> No (please give detail below)
<p><b>Specific service changes</b></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>	<input type="checkbox"/> Yes <input type="checkbox"/> No (please give detail below)
<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:

<b>Recipient</b>	<b>Email</b>
Change Management Committee Secretary	dscomms@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:			
<b>General service changes only</b>			
<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:			
<b>Specific service changes only</b>			
<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)										
<p>Please mark % against each customer class:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50px; border: 1px solid black; text-align: center;"> </td> <td>National Grid Transmission</td> </tr> <tr> <td style="border: 1px solid black; text-align: center;"> </td> <td>Distribution Network Operators and IGT's</td> </tr> <tr> <td style="border: 1px solid black; text-align: center;"> </td> <td>DN Operator</td> </tr> <tr> <td style="border: 1px solid black; text-align: center;"> </td> <td>IGT's</td> </tr> <tr> <td style="border: 1px solid black; text-align: center;"> </td> <td>Shippers</td> </tr> </table> <p><b><u>100%</u></b></p>		National Grid Transmission		Distribution Network Operators and IGT's		DN Operator		IGT's		Shippers
	National Grid Transmission									
	Distribution Network Operators and IGT's									
	DN Operator									
	IGT's									
	Shippers									
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)?

- Yes (please give detail below)
- 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:

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

## Section 11: Business Evaluation Report: Committee Outcome

The BER is approved and the change can proceed			
<b>Modification Changes Only</b>			
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?

Yes (please insert the revised text of the UK Link manual below)

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:

<b>Recipient</b>	<b>Email</b>
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:**

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

--- END OF DOCUMENT ---

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## 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 <b>Relevant Customer Class</b> 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 <b>Restricted Class Change</b> ;
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.