

Stage 03: Draft Modification Report

0386:

Extending rights to Protected
Information provisions for Meter
Asset Managers / Registered
Metering Applicants – unpopulated
MAM id records

This modification is intended to permit the release of the supplier id to a MAM / RMA (following a request from the MAM/ RMA) in circumstances where no current MAM Id is held on central systems. The release of data is limited to Lloyds registered MAMs and would be on an individual MPRN request basis.



Responses invited by 02 September 2011.



High Impact:



Medium Impact:





Low Impact:

Transporters' Agent

What stage is this document in the process?



Proposal



Workgroup Report



Draft Modification Report



Final Modification Report

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 1 of 14

Contents

- **1** Summary
- 2 Why Change?
- **3** Solution
- Relevant Objectives
- **Impacts and Costs**
- Implementation
- The Case for Change
- 8 Legal Text
- Recommendation

- Any questions?
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6

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About this document:

This document is a Draft Modification Report, which was issued for consultation responses, at the request of the Panel on 21 July 2011. The close-out date for responses is 02 September 2011. The Panel will consider the responses and agree whether or not this self-governance modification should be made.

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 2 of 14

Summary

Is this a Self-Governance Modification

The Modification Panel determined that this is a Self-Governance Modification.

Why Change?

Current provisions in the UNC permit the release of supplier and meter asset information to a MAM where they are recorded as the registered MAM on the central systems (also referred to as the supply point register) operated by Xoserve.

There are and will be instances where the MAM id is not populated and a MAM cannot be provided with any information. In May 2011 circa 263,000 supply meter points did not have a MAM id assigned to them.1

The MAM is therefore unable to establish the identity of the supplier to the meter and to take the necessary action to establish the nature of their records and if required complete commercial arrangements for metering services and ensure data accuracy between industry participant systems.

This modification would, with sufficient controls in place, permit the release of the supplier id, meter serial number and meter model by the Transporter to a requesting MAM.

At the June 2011 Modification Panel, Ofgem asked National Grid to confirm if the UNC already permitted the release of this data to an enquiring MAM where the MAM id is blank on the central systems. National Grid has confirmed that the UNC does not permit the release of this data and, therefore, this modification is required to enact the service described in this modification proposal.

Solution

Provide a provision in Section V of the UNC to permit the release of supplier id, meter serial number and meter model to an enquiring MAM where the MAM id is not populated on the central systems operated by Xoserve.

Impacts & Costs

The costs incurred by the Transporters' agent in dealing with enquiries and reporting requirements would be recovered from the requesting MAM.

Implementation

As a Self-Governance Modification, this modification could be implemented 16 days after a Panel decision to do so.

The Case for Change

This modification would provide a more efficient mechanism for resolving the situation of missing MAM ids on central systems, as it would enable the Transporters' Agent to release the identity of the Supplier and the relevant meter serial number to a MAM when provided with the MPRN, where the MAM id is blank on the central systems.

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 3 of 14

¹ Source Xoserve, May 2011

Recommendations

All parties are invited to consider whether they wish to submit views regarding this self-governance modification.

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 4 of 14

2 Why Change?

The responsibility for populating the MAM Id on central systems rests with the supplier/shipper supplying the supply meter point.

Currently, Meter Asset Managers have great difficulty in identifying a supplier to a meter where the supplier (via their shipper) has not populated the MAM Id data on the central systems. As a result, data inaccuracies persist and in the event of a change of supplier activity the incoming shipper/supplier will not know the identity of the MAM.

This modification would enable MAMs to contact the supplier and establish the correct data and commercial records as necessary.

In May 2011 there were circa 263,000 supply meter points where the MAM Id has not been populated on central systems.

There is a view that suggests where a shipper/supplier acquires a supply point where the MAM Id has not been populated by the current supplier, that the incoming shipper/supplier are unable to identify the MAM and cannot establish commercial arrangements.

In some cases SSP consumers may be affected as supply meter points without a MAM id populated against them on central systems are excluded from the PEMS arrangements and in the event of a gas leak on the meter, the meter is made safe and the consumer left to contact their Supplier to request a meter exchange.

This modification would reduce this number of meter points on central systems without a MAM Id and provide a more efficient route to identify the relevant supplier.

It is expected that the Supplier held on central systems would establish commercial arrangements with the MAM. This will then lead to the population of a MAM id on central systems.

The modification may also improve the quality of data on industry participant systems and reduce the risk of duplicate records.

The Workgroup noted that the provision of data would be subject to a bi-lateral agreement between the requesting MAM and Xoserve.

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 5 of 14

3 Solution

The proposed solution is to amend UNC section V to permit the release of data to an enquiring MAM where the MAM id has not been populated on the central systems.

The enquiring MAM would be validated as a valid MAM by checking against the Lloyds Register of approved MAMs. See

http://www.lr.org/sectors/utilities/schemes/mamcop.aspx

If implemented, MAMs would contact Xoserve with MPRNs for which they cannot identify the supplier to request supplier id information. Where the MAM id on central systems is not populated Xoserve shall provide the supplier id, meter serial number and meter model to the enquiring MAM. The MAM must provide the specific MPRN against which they wish to enquire. A request by a MAM for a general enquiry against all MPRNs where the MAM id is not populated would not be accepted.

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 6 of 14

4 Relevant Objectives

Implementation will better facilitate the achievement of Relevant Objectives d and

| е. | |
|--|---|
| The benefits against the Code Relevant Objectives | |
| Description of Relevant Objective | Identified impact |
| a) Efficient and economic operation of the pipe-line system. | None |
| b) 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. | None |
| c) Efficient discharge of the licensee's obligations. | None |
| d) 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. | Improvements to the change of supplier and MAM appoint/de- appoint process are expected |
| e) 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. | Improvements may occur in this area |
| f) Promotion of efficiency in the implementation and administration of the Code | None |

d) Securing of effective competition.

Improvements to the change of supplier and MAM appoint/de-appoint process would be expected as MAMs and Suppliers enter into arrangements and therefore update records. This will help to minimise the administration and costs associated with the change of supplier process.

e) 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.

The provision of more accurate data is likely to benefit Suppliers meeting their obligations for Standards of Service.

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 7 of 14

5 Impacts and Costs

Consideration of Wider Industry Impacts

Implementation would not be expected to be inconsistent with any wider industry developments.

Costs

As a "permissions" only modification no costs are anticipated.

Indicative industry costs – User Pays

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

There are no costs associated with the implementation of this proposal to UNC parties and it is not classified as User Pays

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

Not applicable

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

Not applicable. If any costs were to arise as a result of Xoserve providing this services these costs would be recovered from Meter Asset Managers

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

Impacts

| Impact on Transporters' Systems and Process | |
|---|------------------|
| Transporters' System/Process | Potential impact |
| UK Link | • None |
| Operational Processes | • None |
| User Pays implications | • None |

| Impact on Users | |
|---|------------------|
| Area of Users' business | Potential impact |
| Administrative and operational | None expected |
| Development, capital and operating costs | None expected |
| Contractual risks | None expected |
| Legislative, regulatory and contractual obligations and relationships | None expected |

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 8 of 14

| Impact on Transporters | |
|---|------------------|
| Area of Transporters' business | Potential impact |
| System operation | • None |
| Development, capital and operating costs | • None |
| Recovery of costs | • None |
| Price regulation | • None |
| Contractual risks | None |
| Legislative, regulatory and contractual obligations and relationships | • None |
| Standards of service | • None |

| Impact on Code Administration | |
|-------------------------------|------------------|
| Area of Code Administration | Potential impact |
| Modification Rules | • None |
| UNC Committees | • None |
| General administration | • None |

| Impact on Code | |
|----------------|--|
| Code section | Potential impact |
| TPD V | Revision to permit the release of data |

| Impact on UNC Related Documents and Other Referenced Documents | |
|---|------------------|
| Related Document | Potential impact |
| Network Entry Agreement (TPD I1.3) | None |
| Network Exit Agreement (Including Connected System Exit Points) (TPD J1.5.4) | None |
| Storage Connection Agreement (TPD R1.3.1) | None |
| UK Link Manual (TPD U1.4) | None |
| Network Code Operations Reporting Manual (TPD V12) | None |
| Network Code Validation Rules (TPD V12) | None |
| ECQ Methodology (TPD V12) | None |



Where can I find details of the UNC Standards of Service?

In the Revised FMR for Transco's Network Code Modification

0565 Transco
Proposal for
Revision of
Network Code
Standards of
Service at the
following location:

http://www.gasgovern ance.co.uk/sites/defau lt/files/0565.zip

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 9 of 14

| Impact on UNC Related Documents and Other Referenced Documents | |
|--|------|
| Measurement Error Notification Guidelines (TPD V12) | None |
| Energy Balancing Credit Rules (TPD X2.1) | None |
| Uniform Network Code Standards of Service (Various) | None |

| Impact on Core Industry Documents and other documents | |
|--|------------------|
| Document | Potential impact |
| Safety Case or other document under Gas Safety (Management) Regulations | None |
| Gas Transporter Licence | None |

| Other Impacts | |
|--|------------------|
| Item impacted | Potential impact |
| Security of Supply | None |
| Operation of the Total System | None |
| Industry fragmentation | None |
| Terminal operators, consumers, connected system operators, suppliers, producers and other non code parties | None |

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 10 of 14

6 Implementation

Implementation Date

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0386

Draft Modification Report

22 July 2011

Version 1.0

Page 11 of 14

7 The Case for Change

In addition to that identified above, the Workgroup has identified the following:

Advantages

• No advantages, additional to those identified above, have been identified.

Disadvantages

None identified.

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 12 of 14

8 Legal Text

The Workgroup reviewed the draft legal text and amendments were suggested for inclusion in the final legal text.

UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT

SECTION V - GENERAL

5 INFORMATION AND CONFIDENTIALITY

5.11 Disclosure of Supply Meter Point Information (Annex V-5)

- 5.11.1 Where in respect of any Supply Point the Transporter is requested by a Registered Metering Applicant to disclose to such Registered Metering Applicant the information detailed in Annex V-5 (**"Supply Meter Point Information"**) then the Registered User of such Supply Point agrees that any such request will be regarded as made on behalf of such Registered User and accordingly the Transporter is authorised by such Registered User to disclose such Supply Meter Point Information to the Registered Metering Applicant in accordance with such request.
- 5.11.2 For the purposes of paragraph 5.11.1, "Registered Metering Applicant" is any person who is registered to request and receive Supply Meter Point Information from the Transporter or any person who is not currently registered to request and receive Supply Meter Point Information but such request relates to a period when they were previously registered to request and receive Supply Meter Point Information pursuant to an appropriate registration scheme administered by the Transporter.
- 5.11.3 Where in respect of any Supply Point for which details of the relevant Meter Asset Manager are not populated in the Supply Point Register the Transporter is requested by an Accredited Meter Asset Manager to disclose information in relation thereto to such Accredited Meter Asset Manager, then provided the Accredited Meter Asset Manager notifies the relevant meter point reference number for each relevant Supply Meter Point comprised within such Supply Point to the Transporter the Registered User of such Supply Point agrees that any such request will be regarded as made on behalf of such Registered User and accordingly the Transporter is authorised by such Registered User to disclose the following items of information in respect of each Supply Meter Point comprised in the Supply Point Registration for such Supply Point to the Accredited Meter Asset Manager in accordance with such request:
 - (a) meter serial number;
 - (b) supplier; and
 - (c) model (meter).
- 5.11.4 For the purposes of paragraph 5.11.3, "Accredited Meter Asset

 Manager" is a Meter Asset Manager that is listed on the Ofgem

 MAM Registration Scheme listing of accredited Meter Asset Managers
 published by Lloyds Register.

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 13 of 14

9 Recommendation

All parties are invited to consider whether they wish to submit views regarding this self-governance modification. The close-out date for responses is 02 September 2011, which should be sent to enquiries@gasgovernance.co.uk. A response template which you may wish to use is at: http://www.gasgovernance.co.uk/0386.



Consultation Ends

On 02 September 2011

0386

Draft Modification Report

22 July 2011

Version 1.0

Page 14 of 14