

Workgroup Report
(Alternative to Mod 0282A), Introduction of a process to manage Vacant sites
Modification Reference Number 0282 / 0282A
Version 7.0

This Workgroup Report is presented for the UNC Modification Panel's consideration. The Distribution Workgroup considers that the modification is sufficiently developed and should now proceed to the Consultation Phase.

1 The Modification Proposal

Background

Within the current economic climate there are a large number of domestic and commercial properties that have become vacant. In England alone it is estimated that there are approximately 700,000 homes unoccupied, of which over 300,000 have been vacant for more than six months¹. However despite this fact gas Shippers are unable to effectively reduce their settlement and transportation cost exposure to these sites, as:

- An AQ for a site can only be amended by obtaining meter readings
- A Shipper/Supplier cannot obtain access to the site to obtain meter readings
- The Shipper has no redress to change the AQ of the site to reduce costs

This problem was considered in great detail in relation to the electricity market in 2005 under Issue 14² of the Balancing and Settlement Code and subsequently resulted in the successful introduction of MOD196³ (“Treatment of Long Term Vacant Sites in Settlement”). Modification 196 was introduced in February 2007 and since introduction 50,000 sites have gone through the electricity Vacant process.

The basis of MOD196 is that where a Supplier receives two “notification of failure to obtain reading” flows, with the “site visit check code” noted as “not occupied”, of more than 3 months and no more than seven months apart, they can apply for the site to have the Estimated Annual Quantity (EAC) set to zero. (Mod196 has subsequently been amended (P245) to change the timescales for submission of the site check code to “not less than 75 calendar days and not more than 215 calendar days” to ensure more equitable treatment for Suppliers who operate a quarterly meter read cycle).

Exclusions apply within the process and there are monitoring and ongoing management requirements for sites assigned Vacant status and rules to outline when a site no longer qualifies.

At the present time in the gas market the AQ for a site can only be brought down,

¹ Study by Empty Homes for the 2008 period – www.emptyhomes.com and details outlined on the Parliament website www.uk-parliament.co.uk

² [http://www.elexon.co.uk/documents/modifications/196/P196_attachment_1_\(issue14_report_v1.0\).pdf](http://www.elexon.co.uk/documents/modifications/196/P196_attachment_1_(issue14_report_v1.0).pdf)

³ <http://www.elexon.co.uk/documents/modifications/196/p196.pdf>

where metering readings suggest that there has been a reduction in the gas consumed at a site. However, with a vacant site a Shipper/Supplier cannot gain access to the site to determine that there has been no consumption. In certain circumstances, a warrant can be obtained through the courts however this is a costly procedure and requires a considerable amount of time and effort. It is therefore the case that the Shipper is left with no re-address in respect of changing the AQ of the site or reducing transportation costs to the site.

Proposal

0282A

For clarity the only changes to the Modification 0282 proposal are:

1. That Shippers must confirm a site is still vacant once every 215 days.
2. That vacant sites remain in the RbD process, and
3. That the business rules form a new UNC Related Document and place an obligation on Shippers to ensure their Suppliers abide by them.

It is proposed that a new process be established under the UNC, where a Shipper can reduce their cost exposure to vacant sites, through a process similar to what exists in the electricity market. It is intended at this time that the Vacants process, if implemented, be applied to sites with an Annual Quantity of <73,200kWh. Discussions within the Distribution Workstream to develop a solution to include DM and NDM LSP sites have highlighted a number of areas of concern and as such may require detailed business rules in order to deliver a Vacants solution. In order to expedite the development and delivery of a workable approach for dealing with Vacants within the NDM SSP market sector, this Proposal as been amended to exclude NDM LSP and DM sites at this time.

It is proposed that a site classified as Vacant would be excluded from commodity charging. For the avoidance of doubt, capacity charging would be retained (LDZ Capacity (ZCA), Customer Capacity (CCA), NTS Exit (NNX)). Shippers/Suppliers would continue to apply the isolation and withdrawal process where is deemed appropriate. Shippers will warrant their Suppliers will comply with SPAA Schedule / Shippers will be obligated to ensure Suppliers comply with business rules set out in Appendix One of this Proposal.

In addition a Change Proposal will be raised to SPAA to introduce a Schedule which outlines the procedure to be followed where a Supplier has identified that a premise with an Annual Quantity of <73,200kWh qualifies as vacant and what appropriate action should be taken by Suppliers when managing vacant premises.

It is also proposed that Transporters should provide monthly reports to each Registered User for a relevant MPRNs included within the Vacants process.

Business Rules – Introduction of a process to manage Vacant Sites

0282A

Partaking Shippers must ensure that their contracted Suppliers adhere to the following rules. Shippers bear full responsibility for compliance and in entering a site in to the vacants process the Shipper warrants that it is satisfied that it complies.

1. The Supply Point must be in the requesting Registered Users ownership
2. The Supply Point must be NDM SSP.
3. The Supply Meter Point does not form part of a Sub-Deduct Arrangement.
4. The Registered User will warrant that it has received two notifications from the Meter Read Agent to verify that it is a vacant premise. These attempts must be no less than 75, and no more than 215 calendar days apart.
5. Where a Shipper wishes to utilise the Vacant Site Process and an NDM SSP has been identified as qualifying as Vacant, the Registered User shall notify the Transporter.
6. On receipt of the notification, the Transporter shall amend the Supply Point Register to reflect that the NDM SSP is Vacant providing the previous meter status is live.
7. Following the update to the Supply Point Register, and at D+7 in accordance with UNC, Section H2, NDM SSP Demand will cease to be determined in respect of that NDM Supply Meter Point (Commodity Charging & RbD market Share). For clarity, vacant sites will still count towards a Shipper's RbD market share.
8. The Supply Meter Point will remain within the AQ Review process.
9. Where a NDM SSP increases AQ during the review to a point where it would become LSP, the Transporter will remove it from the Vacants process. This would then be subject to Mod 640 Business as Usual processes. The Transporter will notify the Shipper. For the avoidance of doubt where the NDM SSP increases AQ but remains as a NDM SSP, it will remain in the vacants process
10. Where a Supply Meter Point status is Vacant, the Registered User of the Supply Point will continue to be **gas offtaken**. responsible for the supply point, capacity charges (LDZ Capacity (ZCA), Customer Capacity (CCA), NTS Exit (NNX)), but not commodity charges.~~gas offtaken~~.
11. Where the Registered User acquires evidence that the Supply Meter Point no longer qualifies as Vacant, the Registered User will notify the Transporter at the earliest opportunity.
12. Where a Supply Meter Point is flagged as Vacant, and the Transporter identifies that it is /no longer Vacant , the Transporter will take such actions to notify the Shipper. Where the Registered User receives such notification, they will investigate and remove from the Vacant process.

~~13.~~ Where it has been identified by the Transporter that gas was, or is being offtaken at a NDM SSP during such period as was identified as 'Vacant', the relevant User shall be liable for all charges (including without limitation Transportation Charges) as if it has not been Vacant.

14.13. Where it has been identified by the Transporter that gas was, or is being offtaken at a NDM SSP during such period as was identified as 'Vacant', the relevant User shall be liable for all charges (including without limitation Transportation Charges) as if it has not been Vacant.

~~15.~~14. Where the Registered User notifies the Transporter that the NDM SSP no longer qualifies as Vacant e.g isolated or live, the Transporter will update the Supply Point Register to reflect the appropriate status.

~~16.~~15. Where a NDM SSP has been flagged as Vacant, and subsequently, meter readings are provided by the Registered User to the Transporter, upon receipt of the first meter reading, no action is required to remove the Supply Meter Point from the Vacants process. Where a 2nd meter reading is provided and there is a consumption advance, the Registered User shall remove the NDM SSP from the Vacants Process. The Transporter will provide each Registered User with a monthly report of meter readings received.

~~17.~~16. Relevant charges will re-commence from D+7 following the Shippers notification of status change.

~~18.~~17. Where an NDM SSP maintains a status of Vacant for a continuous period of 24 months, the Registered User will take reasonable steps to Isolate or set to live the NDM SSP.

~~19.~~18. In the event of a change of Registered User the status of Vacant will be removed.

~~20.~~19. Shippers must warrant that a site within the vacants process remains vacant at least once every 215 calendar days. This will be done by providing the Transporter with details of a meter reading agent notification that the site is vacant. Such a notification will have been provided by the meter reading agent since the last valid warranty to the Transporter.

~~21.~~20. If a Shipper fails to do complete the action outlined in point 19, the status of vacant will be removed.

Reporting Requirements

Transporter to provide monthly reports to each Registered User for a relevant MPRN detailing;

Details of each NDM SSP with a status of Vacant.

MPRN	Shipper Short Code	AQ	Date of entry to vacant process (D+7)
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Details of NDM SSP removed from Vacants

MPRN	Shipper Short Code	AQ	Current meter point status	Date of exit from vacant process (D+7)
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Details of NDM SSP flagged Vacant >24months

MPRN	Shipper Short Code	AQ	Date of entry to vacant process (D+7)
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Transporter to provide monthly anonymised reports to the industry

Shipper (Anonymised by % of SSP portfolio)	Total sites in Vacant process	New in the last month	Sites exiting vacant process in the last month	Number of notifications issued under rule 16	Sites that have been in the vacant process >24 months	Total Sites at end of month Column B + Column C – Column D
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Large Transporters Agent will provide report to Shippers re Business Rule 15

MPRN	Read Date	Read	Read Date	Read
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In addition to the above, the Transporter will provide age analysis reports.

Age Analysis			
Shipper (Anonymised by % of SSP portfolio)	Total sites in Vacant process	No. Of Sites >x months	Average period within vacant process

2 User Pays

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

This proposal is a User Pays code service and as such costs should be attributed to those who would benefit from its' implementation.

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

100% of development/operational costs to eligible Shippers, 0% of costs to Transporters

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

100% of operational costs to those Shippers using the vacant sites process.

100% of development costs to all SSP Shippers based on supply point count at the date of implementation.

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

To be determined.

3 Extent to which implementation of the proposed modification would better facilitate the relevant objectives

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

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

Standard Special Condition A11.1 (b): *so far as is consistent with sub-paragraph (a), the (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters;*

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

Standard Special Condition A11.1 (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 this relevant objective.

Standard Special Condition A11.1 (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 (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers;*

This Proposal would ensure more accurate allocation of costs are more reflective of customer usage in the SSP market by stopping commodity charges and energy allocation. This is a more cost effective process for managing Vacant sites than resorting to isolation. This is based on the assumption that there are different propensities of vacant sites across SSP Shipper portfolios by LDZ.

Misuse of the Vacant Sites process will lead to an inaccurate apportionment of

unidentified gas shared across live supply points. However, British Gas considers that the increased controls contained in Mod0282A over Mod0282 mitigate this risk.

Standard Special Condition A11.1 (e): *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 (within the meaning of paragraph 4 of standard condition 32A (Security of Supply – Domestic Customers) of the standard conditions of Gas Suppliers’ licences) are satisfied as respects the availability of gas to their domestic customers;*

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

Standard Special Condition A11.1 (f): *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.*

This proposal would increase choice of services provided through UNC.

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

No implications on security of supply, operation of the Total System or industry fragmentation have been identified.

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

a) implications for operation of the System:

There are no implications for operation of the System.

b) development and capital cost and operating cost implications:

The ROM analysis indicates Development costs are in the region of 520k and 672k.

With on-going annual costs for producing and validating the monthly shipper summary report will cost at least £800, but probably not more than £1200, per shipper short code (Business Rule – Reporting).

This invoicing costs to recover charges for incorrectly identified vacant sites is likely to be in the region of £200 to £400.

British Gas considers that as Mod0282A leaves vacant sites within the RbD process, the costs associated with implementing this Proposal will be less than those provided above.

c) extent to which it is appropriate to recover the costs, and proposal for the most appropriate way to recover the costs:

See the User Pays section.

d) Analysis of the consequences (if any) this proposal would have on price regulation:

No such consequence is anticipated.

6 The consequence of implementing the Modification Proposal on the level of contractual risk of each Transporter under the Code as modified by the Modification Proposal

No consequences have been identified.

7 The high level indication of the areas of the UK Link System likely to be affected, together with the development implications and other implications for the UK Link Systems and related computer systems of each Transporter and Users

See ROM for details of Transporters impacted systems.

There may be impacts on Shipper RGMA system flows, these were not included in the ROM and may result in Shippers who do not elect to take the service incurring costs.

8 The implications of implementing the Modification Proposal for Users, including administrative and operational costs and level of contractual risk

Administrative and operational implications (including impact upon manual processes and procedures)

Where Users elect to take the service they will face development and operational process changes.

There may be operational impacts for Users who do not take the service as they may need to run an exceptions process.

Development and capital cost and operating cost implications

Where Users elect to take the service they will face development and operational cost.

Where Users elect not to take the service they may face additional costs to implement a system they do not use.

Where Users elect not to take the service they may face additional costs through RbD allocation.

Consequence for the level of contractual risk of Users

Users who access this product would need to comply with the proposed SPAA schedule to which they may not be signatories.

British Gas considers that there will be no consequences on the level of contractual risk for Users with Mod0282A.

9 The implications of implementing the Modification Proposal for Terminal Operators, Consumers, Connected System Operators, Suppliers, producers and, any Non Code Party

Suppliers will need to adhere to the relevant SPAA schedule. Some Workgroup members wished to have visibility to the SPAA Schedules Changes to aid the Consultation Process.

10 Consequences on the legislative and regulatory obligations and contractual relationships of each Transporter and each User and Non Code Party of implementing the Modification Proposal

No consequences have been identified.

11 Analysis of any advantages or disadvantages of implementation of the Modification Proposal

Advantages

- Shippers with SSP sites can reduce their cost exposure on a specific vacant site where they choose not to isolate.
- Provides Shippers with SSP sites options rather than just isolation
- Currently Shippers with SSP sites are more likely to isolate, whereas with this proposal they are more likely to use the Vacant site process, therefore reducing inconvenience to new Consumers at a site.
- Some Shippers consider there will be more accurate costs allocated across the industry

Disadvantages

- Some Shippers consider there will be a reduction in the accuracy of costs allocated across the industry
- To the extent that unidentified gas can be created at Vacant sites and that these sites will not be included in RbD distorts the costs to RbD Shippers.
- Transporters consider this process increases the number of unoccupied premises with a live gas supply, by leading to a reduction in isolations, which

may have consequences on Safety.

- Some Shippers consider the process promotes discrimination between customers based on AQ.
- Some workgroup members were concerned the SPAA schedule was unavailable at the time the report was concluded and therefore were unable to fully consider the relevant objectives.

British Gas considers that only points 3 and 4 of the disadvantages listed above apply to Mod0282A.

12 Summary of representations received (to the extent that the import of those representations are not reflected elsewhere in the Workstream Report)

No written representations have been received.

13 The extent to which the implementation is required to enable each Transporter to facilitate compliance with safety or other legislation

No such requirement has been identified.

14 The extent to which the implementation is required having regard to any proposed change in the methodology established under paragraph 5 of Condition A4 or the statement furnished by each Transporter under paragraph 1 of Condition 4 of the Transporter's Licence

No such requirement has been identified.

15 Programme for works required as a consequence of implementing the Modification Proposal

System changes for both Users and Transporters.

16 Proposed implementation timetable (including timetable for any necessary information systems changes and detailing any potentially retrospective impacts)

It is proposed that this functionality be introduced at the earliest opportunity following a positive direction from the Authority.

British Gas considers Mod0282A is able to be implemented immediately following a direction to do so from Ofgem. Given the likely materiality of the scale of any cost reallocation, were this Proposal to be approved, they propose that it be implemented without delay.

17 Implications of implementing this Modification Proposal upon existing Code Standards of Service

No implications of implementing this Modification Proposal upon existing Code Standards of Service have been identified.

18 Workgroup recommendation regarding implementation of this Modification Proposal

The Distribution Workgroup considers that the modification is sufficiently developed and should now proceed to the Consultation Phase.