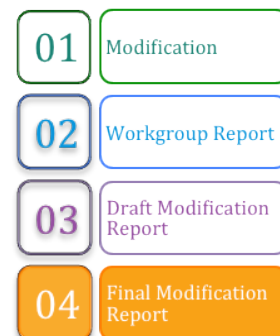


Stage 04: Final Modification Report

0482S:

Proposed Changes to Mod 81 Reports to be effective from 01/7/14

At what stage is this document in the process?



Changes to Mod 81 Reports. It is requested the above changes are effective from 01 July 2014.



Panel considered this report on 06 June 2014



High Impact:
None



Medium Impact:
None



Low Impact:
Changes required to Xoserve reporting

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About this document:		 telephone
This Final Modification Report was presented to the Panel on 06 June 2014.		Transporter: Wales & West Utilities
The Panel determined that this self-governance change should be made.		Systems Provider: Xoserve
		 commercial.enquiries@xoserve.com

1 Summary

Is this a Self-Governance Modification?

The Modification Panel determined that this is a self-governance modification because it is unlikely to have material effect on consumers or competition.

Why Change?

UNC Section G 1.6.18 – 1.6.20 requires Transporters to publish information regarding the manner in which the AQ review is conducted. These reports are commonly referred to as “Mod 81 Reports”.

The current drafting of UNC, Section G, Paragraph 1.6.18(a) requires that for each User, in aggregate across all EUCs, the number of successful AQ amendment applications made is reported. This information is displayed in a number of reports which are periodically provided to Shippers during and after the AQ Review. Within the reports, User identities are protected by use of pseudonyms identifiers.

Implementation of Modification 0292 resulted in the AQ amendment tolerance reducing from +/- 20% to +/- 5%. As a consequence the number of AQ amendments that a Shipper has the ability to submit has substantially increased. In some instances Shippers may submit more than one AQ amendment for a Meter Point as meter readings or revised asset information becomes available within the AQ Amendment window.

Currently Mod 81 Reports 1 and 2 provide an aggregated position based on the number of successful AQ amendments submitted by individual Shippers. Current reporting based on all successful amendments has the potential to distort the overall picture of AQ movements (increasing and decreasing), as the reporting includes any multiple amendments for the same site. The reports therefore misrepresent individual Shipper energy movements by LDZ.

Solution

It has been identified that Mod 81 Reports 1 and 2 are amended to report on effective AQ amendments. In addition the terminology used within the reporting column headings will be amended to align with UNC terminology.

Relevant Objectives

Implementation of this modification will introduce increased clarity to the information provided to Shippers regarding AQ amendment activity within the AQ Review Process. As a consequence of this revised approach to reporting, the reporting pack produced by Xoserve and presented at the AQ Operational Meeting should be more representative of effective AQ amendment activity by Shippers and therefore produce a more accurate picture of energy movements by LDZ and market sector. Therefore this proposal furthers relevant objectives d) Securing of effective competition and (f) – promotion of efficiency in the implementation and administration of the Code.

Implementation

The Transporters Agent has indicated that no material costs will be incurred as a consequence of implementing this modification.

No implementation timescales are proposed. However, 1st July 2014 would be beneficial to coincide with the first release of the Mod 81 Reports as required within UNC Section G 1.6.20(a).

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2 Why Change?

Implementation of Modification 0292 resulted in the AQ amendment tolerance reducing from +/- 20% to +/- 5%. As a result the number of AQ amendments that a Shipper has the ability to submit has substantially increased. In some instances Shippers may submit more than one AQ amendment for a Meter Point as meter readings or revised asset information becomes available within the AQ Amendment window.

Reports 1 and 2 provide an aggregated position based on the number of successful AQ amendments submitted by individual Shippers. Some Shippers who attended the Xoserve AQ Operational Meeting held in Nov 2013 expressed a view that it would be beneficial if reporting was based on the number of effective AQ amendments. Current reporting based on all successful amendments has the potential to distort the overall picture of AQ movements (increasing and decreasing) and therefore misrepresent individual Shipper energy movements by LDZ.

At the 7th January 2014 Distribution Workgroup a new Issue was raised entitled "AQ reporting to include amendments that result in a revised AQ". The Workgroup debated the Issue and were generally supportive of a change to the reporting criteria. However, the Workgroup suggested that a broader opinion should be sought from the industry, specifically from organisations' AQ subject matter experts. A further meeting was therefore held on 24th January to discuss the proposed changes.

The opinions from those attendees at the AQ Operational Meeting, who commented on the proposed reporting, agreed that the changes would add clarity to the Mod 81 Reports and as such were supportive.

3 Solution

Proposed Changes to Mod 81 Reports

It is proposed to make the following changes to the Mod 81 reports and that these changes should be effective from 01 July 2014. The opinions from those attendees at the AQ Operational Meeting, who commented on the proposed reporting, agreed that the changes would add clarity to the Mod 81 Reports and as such were supportive.

1. Changes to the Structure of Reports

This Modification seeks to make the following amendments to the current suite of Mod 81 Reports;

Report 1: “AQ Trends Report – Total number of Accepted Amendments Received by LDZ (Count and Energy)”

Report 2: “Accepted Shipper Amendments – increasing and decreasing AQ by Shipper”

Proposed Solution - Report 1 & 2 –Only effective AQ amendments for each Registered Shipper User are reported.

Reports issued on 1st July and 1st August will report on the latest effective Amendments submitted by a Shipper and will be referenced as “User Provisional AQ”. The 1st November report will show the AQ that becomes live as at 1st October YY i.e. the Effective AQ.

2. Terminology Changes

In addition changes are proposed, where necessary, to the column headings of Mod 81 Reports (Reports 1 to 10) to ensure that UNC Terminology is consistently applied. This change will enhance Shipper’s ability to interpret the information being displayed within the contents of the Mod 81 Reports.

Existing Mod 81 Terminology	UNC Terminology
Sum Current AQ	Current AQ
Sum Proposed AQ (kWh)	Provisional AQ
Sum New (kWh)	Effective AQ

3. Illustration of Proposed Changes

For the purposes of this Modification, the impact of the proposed changes outlined above on Mod 81 Reports 1 and 2 are displayed below:

Report 1 - format as currently published

LDZ	State	Count Of Meter Points	Sum Current AQ (kWh)	Sum Proposed AQ (kWh)	Sum New (kWh)
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(Revised Format)

1st July, 1st August

LDZ	State	Count Of Meter Points	Current AQ	Provisional AQ (kWh)	User Provisional AQ
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1st November 2014

LDZ	State	Count Of Meter Points	Current AQ	Provisional AQ (kWh)	Effective AQ
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Report 2 - format as currently published (no format changes required).

State	Accepted	Decreasing AQ's	Increasing AQ's
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For the avoidance of doubt, User identities will continue to be protected by the use of pseudonyms.

It is proposed that these changes are effective from 1st July 2014.

The Transporters Agent has indicated that no material costs will be incurred as a consequence of implementing this Modification.

User Pays

Classification of the modification as User Pays, or not, and the justification for such classification.

This is a User Pays modification as costs may be incurred amending the existing reports although the Transporters Agent has indicated that these costs would be minimal. On that basis Transporters have indicated that they would absorb these marginal costs – i.e. there is nothing to recover from Users.

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

n/a

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

n/a

Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.

n/a

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4 Relevant Objectives

Impact of the modification on the Relevant Objectives :	
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.	None
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.	None
f) Promotion of efficiency in the implementation and administration of the Code.	Positive
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

f) Promotion of efficiency in the implementation and administration of the Code.

Implementation of this modification will introduce increased clarity and visibility to the information provided to Shippers regarding AQ amendment activity within the AQ Review Process therefore promoting efficiency in the implementation and administration of the Code. More accurate reporting may provide greater confidence to all Users on Shipper amendment activity and that AQ amendments are being raised in accordance with the rules outlined within UNC Section G. 1.6.4

5 Implementation

As self-governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement. However, 1st July 2014 would be beneficial to coincide with the first release of the Mod 81 Reports as required within UNC Section G 1.6.20(a).

Xoserve has indicated that no material costs will be incurred by the implementation of this Modification.

6 Legal Text

Text

The following Text has been prepared by Wales & West Utilities at the request of the Modification Panel and no issues were raised by the Workgroup regarding its content.

UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT

SECTION G – SUPPLY POINTS

1.6 Annual Quantity

1.6.18 The Transporters shall publish, by the dates specified in paragraph 1.6.20, a report on applications containing the following information in respect of each User (on a non attributable basis):

- (a) in aggregate across all End User Categories:
 - (i) the number of applications made by the User during the User AQ Review Period (in accordance with paragraph 1.6.4) for an increase in the Provisional Annual Quantity and for a decrease in the Provisional Annual Quantity;
 - (ii) the number of such ~~effective -AQ amendment~~~~successful~~ applications made by the User during the User AQ Review Period (in accordance with paragraph 1.6.7) that resulted in a User Provisional Annual Quantity shown by the resulting increase and decrease in comparison to the Provisional Annual Quantity split by KWh movement bands;
 - (iii) the number of Speculative Calculation enquiries made by the User during the preceding Gas Year;
 - (iv) the change to the Annual Quantity ~~in aggregate (expressed in KWh)~~ that has occurred due to the increases or decreases as a result of the ~~effective AQ amendment~~~~successful~~ applications referred to in (a)(ii);
- (b) by each End User Category:
 - (i) the number of Supply Meter Points where the Annual Quantity has increased or decreased as a result of the ~~effective -successful~~ ~~AQ amendment~~ applications referred to in (a)(ii) shown as a percentage of the total number of Supply Meter Points in that End User Category;
 - (ii) the change to the Annual Quantity in aggregate (expressed in kWh) that has occurred due to the increases or decreases as a result of the ~~effective AQ amendment~~~~successful~~ applications referred to in (a)(ii);
 - (iii) the number of Supply Points that have moved from one End User Category to another End User Category as result of the ~~successful~~ ~~effective AQ amendment~~- applications referred to in (a)(ii);
- (c) by each LDZ, the number of such ~~effective AQ amendment~~ ~~successful~~ applications made by the User during the User AQ Review Period (in accordance with paragraph 1.6.7) that resulted in a User Provisional Annual Quantity shown by the resulting increase and decrease in comparison to the Provisional Annual Quantity.

1.6.19 For the purposes of paragraph 1.6.18 and 1.6.26:

- (a) **“User AQ Review Period”** is the period during which the User may apply for a User Provisional Annual Quantity in accordance with 1.6.4(a), commencing on the AQ Review Date and ending on the 13 August in the preceding Gas Year;
- (b) **“Speculative Calculation”** means an estimate of the Annual Quantity of a Supply Point derived by the User, using relevant Meter Reads for

the Supply Point and the speculative calculator tool which is available for use within UK Link;

(c) **“User AQ Appeal Period”** is the period detailed in paragraphs 1.6.13(a) and (b) during which the User may appeal the Annual Quantity notified by the Transporter in respect of a Supply Meter Point.

~~(e)~~(d) **“effective AQ amendment”** is the most up to date accepted amendment at the time the report is produced - i.e. the last accepted deemed change that will apply in the absence of any further change.

7 Consultation Responses

In the 6 representations received implementation was unanimously supported.

Representations are published alongside the Final Modification Report.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
British Gas	Support	f - positive	<ul style="list-style-type: none">seeks to improve transparency and improve accurate reporting of AQ Amendments under the Mod 81 Reports.will better define the AQ Trends Report.
EDF Energy	Support	d – positive f - positive	<ul style="list-style-type: none">will improve the transparency and accurate reporting of AQ amendments.
E.ON UK	Support	f - positive	<ul style="list-style-type: none">will improve the transparency in the AQ Review reporting and will give the industry greater confidence in the accuracy of AQs.
RWE npower	Support	d – positive f - positive	<ul style="list-style-type: none">will provide an accurate picture of energy movements by LDZ and market sector and provide transparency of the information provided.
ScottishPower	Support	f - positive	<ul style="list-style-type: none">will introduce increased clarity to the information provided to Shippers regarding AQ amendment activity within the AQ Review Process.
SSE	Support	f - positive	<ul style="list-style-type: none">will increase the overall accuracy of the Mod 81 Reports as at present they include all amendments made by shippers and not just the effects of the final amendments.

Additional Issues Identified in Responses

No additional issues were identified.

8 Panel Discussions

The Panel Chair summarised that currently UNC Sections G 1.6.18 – 1.6.20 requires Transporters to publish information regarding the manner in which the AQ review is conducted, commonly referred to as “Mod 81 Reports”. The current drafting of G 1.6.18(a) requires that for each User, in aggregate across all EUCs, the number of successful AQ amendment applications made is reported. This information is displayed in a number of reports, which are periodically provided to Shippers during and after the AQ Review.

Modification 0292 reduced the AQ amendment tolerance from +/- 20% to +/- 5%, resulting in an increase in the number of AQ amendments submitted. In some instances Shippers may submit more than one AQ amendment for a Meter Point as meter readings or revised asset information becomes available within the AQ Amendment window.

Currently Mod 81 Reports 1 and 2 provide an aggregated position based on the number of successful AQ amendments submitted by individual Shippers and has the potential to distort the overall picture of AQ movements as it may include multiple amendments for the same site.

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Members considered the six representations received noting that there was unanimous support for implementation of the modification.

In considering the relevant objectives, Members agreed that the proposed changes would introduce increased clarity to the information provided to Shippers regarding AQ amendment activity within the AQ Review Process. Members also noted that, as a consequence of this revised approach to reporting, the pack should be more representative of effective AQ amendment activity by Shippers, therefore producing a more accurate picture of energy movements by LDZ and market sector. Members agreed that the proposal seeks to further relevant objectives d) Securing of effective competition and (f) promotion of efficiency in the implementation and administration of the Code.

Members also noted the proposed effective implementation date of 06:00hrs on 01 July 2014.

Members then voted unanimously to implement Modification 0482S.

9 Recommendation

Panel Recommendation

Having considered the Modification Report, the Panel determined:

- that proposed self-governance Modification 0482S should be made.