














Stage 04: Final Modification Report		At what stage is this document in the process?
<h1>0526S:</h1> <h2>Identification of Supply Meter Point pressure tier</h2>		<div style="display: flex; flex-direction: column; align-items: flex-end;"> <div style="border: 1px solid green; border-radius: 5px; padding: 5px; margin-bottom: 5px;">01 Modification</div> <div style="border: 1px solid blue; border-radius: 5px; padding: 5px; margin-bottom: 5px;">02 Workgroup Report</div> <div style="border: 1px solid purple; border-radius: 5px; padding: 5px; margin-bottom: 5px;">03 Draft Modification Report</div> <div style="border: 1px solid orange; border-radius: 5px; padding: 5px; background-color: #f4a460;">04 Final Modification Report</div> </div>
<p>Aims to improve the communication of the Supply Meter Point Pressure Tier by the Gas Transporter (GT) to the Shipper/Supplier/MAM.</p>		
	The Panel determined that this self-governance modification should not be implemented.	
	High Impact: None	
	Medium Impact: Transporters	
	Low Impact: Shippers, Suppliers and Meter Asset Managers (MAMs)	

Contents		 Any questions?
1 Summary	3	Contact: Code Administrator
2 Why Change?	3	 enquiries@gasgovernance.co.uk
3 Solution	4	 0121 288 2107
4 Relevant Objectives	5	Proposer: Colette Baldwin
5 Implementation	7	 Colette.baldwin@eonenergy.com
6 Impacts	8	 02476 181382
7 Legal Text	8	Licence Holder: Northern Gas Networks
8 Consultation Responses	8	 jferguson@northern-gas.co.uk
9 Panel Discussions	18	Systems Provider: Xoserve
10 Panel Decision	20	 commercial.enquiries@xoserve.com
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This Final Modification Report was considered by the Panel on 16 June 2016. The Panel determined that this modification should not be implemented.		 Tom.Chevalier@PowerDataAssociates.com
Modification timetable:		 01525 862870
Initial consideration by Workgroup	26 February 2015	
Amended Modification considered by Workgroup	28 April 2016	
Workgroup Report presented to Panel	19 May 2016	
Draft Modification Report issued for consultation	19 May 2016	
Consultation Close-out for representations	10 June 2016	
Final Modification Report presented to Panel	13 June 2016	
UNC Modification Panel decision	16 June 2016	

1 Summary

Is this a Self-Governance Modification?

In its initial assessment (19 February 2015) the Modification Panel determined that this was not a self-governance modification as it may have material impacts on commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

The Workgroup considered that as this modification has been amended and its scope reduced compared to the original, it was now suitable for Self-Governance procedures, as it is simply providing pressure tier information through an alternative route to that currently provided using the GT1 process. The information would be provided at a post code level rather than meter point level, therefore its impact would be immaterial on commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

Following reassessment (19 May 2016), the Modification Panel determined that this modification could now be assigned self-governance status, as there were no material impacts on commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

Is this a Fast Track Self-Governance Modification?

This is not a Fast-Track Self Governance modification as it is not a housekeeping modification.

Why Change?

Shippers/Suppliers/Meter Asset Managers (MAMs) require knowledge of the pressure tier applicable to a specific MPRN to ensure they send the appropriate skilled staff with the correct metering equipment. Currently, this information can be obtained by specific enquiry of the Gas Transporter (GT) using the GT1 procedures¹. The GT1 procedure is manual and time-consuming for the enquirer and the GT who has to respond.

Solution

Gas Transporters (excluding National Grid NTS) will be required to publish an electronic list of the relevant pressure tier applicable to the MPRNs (including those without a meter attached) on their network by postcode and to make it available to relevant industry parties, Shippers/Suppliers/MAMs. The list should be refreshed on a quarterly basis.

Relevant Objectives

The existing GT1 procedure is manual, labour intensive and time-consuming for the enquirer and the GT. Recording the information centrally so that relevant stakeholders can obtain the data directly will be more efficient; it will reduce the need for GTs to resource the GT1 process and enable Users to obtain the information directly. This should result in lower on-going operational costs for GTs and will improve the timeliness of access to the data and ensure that shippers/suppliers or MAMs can ensure that relevant, suitably trained staff (with appropriate equipment) attend site and therefore further Relevant Objective d).

Implementation

No implementation timescales are proposed. However, if self-governance procedures were followed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised and Transporters systems being available.

¹ www.energynetworks.org/gas/regulation/gas-transporter-procedures.html

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No. There are no Significant Code Review impacts.

2 Why Change?

The Supply Meter Point pressure tier is not currently stored and communicated in industry data flows. On specific request of the GT, using forms defined by GT procedures², the Supply Meter Point pressure tier will be provided for a MPRN. Shippers, Suppliers and MAMs require knowledge of the Supply Meter Point pressure so that they can send appropriately trained staff, with the appropriate equipment, to complete the intended metering work. Sending the wrong person to site results in abortive work and a frustrated customer, and in the worst case inappropriate work.

It is impractical for the MAM to send, or for the GT to respond, to multiple requests using the current forms. In theory the MAM could submit a request in advance of every metering task, although this is more likely on sites where the MAM anticipates an elevated pressure. Historically, whether to submit a GT1 request may have been based on local knowledge. This local knowledge has effectively been lost as companies operate on a national basis. Dependent on the risk that the parties wish to take, in the extreme, this could lead to every MAM submitting a GT1 in advance of all meter work, with the resulting administrative burden on GT and Shipper/Supplier/MAM. The forthcoming roll out of smart metering will require visits to ~20m premises. In principle a GT1 could be submitted in advance of work at each of these sites.

Association of Meter Operator (AMO) members have indicated that in the domestic sector the aborted visits are in the order of 1 in 1000 visits, which over the life of the smart meter roll out could equate to 25,000 aborted calls, with the associated cost and customer frustration. In the I&C sector this figure is higher, a member operating in this sector has aborted 5% of their meter exchange visits when they attended site to find the installation to be MP or IP.

Sending a meter operative with the incorrect training and equipment for the Supply Meter Point pressure tier will generally lead to an aborted visit, a frustrated customer, wasted costs and delayed completion of the planned work. In the worst scenario, it could lead to inappropriate work, which would lead to a safety incident with all the consequential impact on GT, Shipper, Supplier, MAM, Customer and members of the public. The Health and Safety Executive (HSE) have highlighted this at MAM Code of Practice (MAMCOP) situations where inappropriate work has been performed.

The Gas Safety (Management) Regulations 1996, Regulation 6(8)³ state:

“...A person who conveys gas in a network shall, where he is requested to do so by a person proposing to carry out work in relation to a gas fitting, provide him with information about the operating pressures of the gas at the outlet of a service pipe. ...”

“gas fittings” means gas pipework, valves, regulators and meters, and fittings, apparatus and appliances...”

² www.energynetworks.org/gas/regulation/gas-transporter-procedures.html

³ www.legislation.gov.uk/uksi/1996/551/regulation/6/made

3 Solution

Proposed Solution

There is currently no specific data item on the Xoserve systems to store the pressure level. The modification proposes that the Gas Transporters (excluding NTS) create a centrally accessible register of pressure tier by post code, and that it is hosted on the Transporter Agency's website. Access to the register will be made available to UNC parties as well as to Suppliers and Meter Asset Managers, by an appropriate mechanism.

The Gas Transporters will provide portfolio data to the Gas Transporters Agency quarterly:

The portfolio file required is:

File 1: Post code data only. The file will contain the following data items:

- Post code – in and out code;
- Gas Transporter;
- Relevant Pressure Tier (where suspected mixed or unknown pressures, the pressure tier should be mark as 'GT1' – indicating that Users should revert to the GT1 process).

GT1 lists the pressures as: "LP, MP35, MP65, MP105, MP180, MP270, IP and other". It is proposed that at post code level, the Pressure Tier' will be defined as a valid set as follows:

- LP
- MP35
- MP65
- MP105
- MP180
- MP270
- IP
- Mixed
- Unknown

It is acknowledged that some GTs may not have perfect historic records and so the GT1 process will still be required where the GT has mixed pressure tiers within a postcode, or the historical records require verification by GTs desktop exercise or site visits.

It is proposed that data is updated and refreshed quarterly - at the end of February, May, August and November each year. This will result in the data becoming richer over time.

It is believed that GTs are as keen as other stakeholders to ensure the records are correct, so by making the data more easily accessible it will reduce the opportunity for error, reduce paperwork exchanges of GT1 forms, and reduce duplicate work as a result of subsequent GT1 requests.

The GT1 procedure can also be used, as now, to gain any additional information for those sites where it is of value.

Any genuine engineered changes of the 'Supply Meter Point Pressure Tier' at a site will require dialog between the GT & MAM in advance of the work being undertaken to ensure the work to change the pressures are co-ordinated at site. It is not envisaged that updating the central systems will be an appropriate communication for this infrequent operational activity.

Nothing in this proposal would remove the parties' obligation to check the actual pressure at site prior to commencing work. The existing operational safety activities would remain to minimise the opportunity of error.

If a MAM believed that the information provided was incorrect, then they should report this to the GT with any supporting evidence, and the GT should review its records, advise the MAM and update the central records.

As part of the data gathering stage MAMs have indicated that they may be willing to provide their records of pressure tier to the GTs to assist the GTs to review and ensure their records are as complete as possible.

User Pays	
Classification of the modification as User Pays, or not, and the justification for such classification.	No system changes are envisaged by this proposal. Since the Proposer believes that the process will result in reduced overall costs for the GTs in avoiding much of the GT1 manual process, then it would be envisaged that the GTs would not seek to recover any costs.
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.	Transporters to fund 100%, as the GT1 process is currently a funded activity.
Proposed charge(s) for application of User Pays charges to Shippers.	None
Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.	None

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.	Positive
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.	None
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

The Workgroup considered that relevant objective d) is further by this modification for the following reasons:

The existing GT1 procedure is manual and labour intensive. Recording the information centrally so that relevant stakeholders can obtain the data directly will reduce on-going operational costs for GTs. GTs have an existing duty to respond to requests from parties; historically these requests have been made only where applicants suspect the site may not be low pressure based on local knowledge.

Historically, the Shipper/Supplier/MAM may only make a GT1 request when they suspect the connection is not low pressure, this request may have been based on local knowledge, which is increasingly lost as companies operate nationally. Dependent on the risk that the parties wish to assume, in the extreme this could lead to every MAM submitting a GT1 in advance of all meter work, with the resulting administrative burden on GT, Shipper, Supplier and MAM.

Sending a meter operative with the incorrect training and equipment will generally lead to an aborted visit, a frustrated customer, wasted costs and delayed completion of the planned work. In the worst case scenario, it could lead to inappropriate work which would lead to a safety incident with all the consequential impact on GT, Shipper, Supplier, MAM, Customer and members of the public.

It should also be noted, that a number of Workgroup participants felt that the modification be more appropriate as a Supply Point Administration Agreement change (SPAA) rather than a UNC change.

5 Implementation

No implementation timescales are proposed. The Workgroup noted however, if self-governance procedures were to be followed, then implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised and Transporters' systems being available.

As self-governance procedures are now proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised and Transporters' systems being available.

6 Impacts

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No. There are no Significant Code Review impacts,

Pre-Nexus Implementation

The modification proposes a pre implementation, however the Gas Transporters have indicated that this can be achieved relatively easily and without system development requirements.

Nexus Implementation

The changes do not propose amendments to the existing requirements for the Nexus Go-Live design.

Post Nexus Implementation

No, the anticipated delivery of this change is within 3 months of a decision, well ahead of Project Nexus Implementation Date.

7 Legal Text

Text Commentary

Text Commentary was not available for Workgroup assessment.

Text Commentary was subsequently provided by Northern Gas Networks as follows:

The text obligates the Transporter (excluding National Grid NTS) to publish the pressure tier data by postcode on a quarterly basis, identifying the pressure tiers outlined in the GT1 document maintained by the Energy Networks Association.

Text

Text was not available for Workgroup assessment.

Text was subsequently provided by Northern Gas Networks as follows:

TRANSPORTATION PRINCIPAL DOCUMENT

SECTION V - GENERAL

Add new Paragraph 5.18

5.18.1 The Transporter (excluding National Grid NTS) shall publish on a quarterly basis by postcode details of the relevant pressure tiers operating within its gas distribution network from time to time.

5.18.2 For the purposes of this paragraph “**Relevant Pressure Tier**” shall mean the low, medium and intermediate pressure tiers of the gas distribution network more particularly identified from time to time within the Energy Networks Association published document GDN/PM/GT/1.

8 Consultation Responses

The summaries in the following tables are provided for reference on a reasonable endeavours basis only. We recommend that all representations be read in full when considering this Report. Representations are published alongside this Report.

Of the 16 representations received 10 supported implementation, 1 offered qualified support and 5 were not in support.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
Association of Meter Operators	Support	d) - positive	<ul style="list-style-type: none">• The modification supports efficiency of Suppliers and MAMs in scheduling the appropriately trained staff to attend customer premises.• It has the potential to reduce the costs associated with abortive site visits and thereby reduce customer frustrations.• Expects that the data quality will grow and improve over time through the quarterly update mechanism for new sites, supplemented by feedback from GT1 requests.
British Gas Trading	Oppose	d) - positive	<ul style="list-style-type: none">• Whilst supportive of the intent of the modification, their objection stems from the fact that Transporter costs to provide the service remain undefined – not providing this information creates a dangerous precedent, and as a consequence, believes the modification should NOT progress until the full Transporter costs are provided.

			<ul style="list-style-type: none"> • Unable to support self-governance status for the modification citing that: <ul style="list-style-type: none"> ○ The proposal creates a cross subsidy between shippers who pick up the costs and MAPs and MAMs who will benefit. ○ As MAP and MAM operations differ across the industry, it does not necessarily follow that these costs are applied to the correct industry parties and their customers. ○ As this creates a distortion within the market, Ofgem should arbitrate over such a decision. • Does not foresee any internal costs associated with the implementation of the modification.
EDF Energy	Support	d) - positive	<ul style="list-style-type: none"> • Provision of pressure related information is a legislative requirement and this supports the drive to facilitate the provision of information more efficiently and effectively. • The provision of the information enhances existing MAM processes and ensures the appropriate skilled staff, with the correct equipment, are sent to site. • Whilst it would prefer the pressure tier information to be accessible at a metering point level, believes that the proposed solution is still an improvement on the current baseline provisions. • Supports self-governance status. • Suggests that whilst the volume of aborted gas meter installations is estimated to be relatively low, anything that reduces costs and time is welcomed. • Would like to be able to download the information from the central register in its entirety in order to avoid having to check the register for each planned site visit, otherwise this would potentially continue to be an inefficient and costly exercise. • Believes that the legal text does not reflect the intent of the modification and therefore offers a suggested amendment.
ENGIE Gas Limited	Support	d) - positive	<ul style="list-style-type: none"> • Removes the need to make specific enquiries on supply pressure tier information on an MPAN by MPAN basis and thereby leads to improved industry efficiency gains. • Supports self-governance status. • Does not foresee any significant impacts and anticipates overall saving in efficiency.

E.ON UK	Support	d) - positive	<ul style="list-style-type: none"> • The provision of the information proposed greatly reduces the need for the GT1 process leading to reduced costs for Transporters. • Implementation would improve competition between shippers and suppliers by removing: inefficient transportation charges, abortive visit costs for agents, failed appointment costs paid to customers and leading to an improved customer experience. • The proposed self-service approach to accessing/verifying information will become increasingly beneficial over time as the ramp up in the rollout of smart meters could potentially result in a greater number of enquiries being managed by Users – the GT1 process would be utilised in exceptional circumstances. • Supports self-governance status.
ESP Pipelines	Qualified Support	d) - positive	<ul style="list-style-type: none"> • Notes that the iGTs are working on Modification iGT075 that has some differences to 0526S. • Whilst not directly commenting on the self-governance status for this modification, points out that iGT075 is not proposed to be self-governance on the grounds that it impacts on both GT and Shipper systems. • Prefers provision of a uniformed arena on which to host the information. • Points out that iGT075 places emphasis on HP, LP, MP and IP.
Gazprom Energy	Support	d) - positive	<ul style="list-style-type: none"> • Reduces the need to make specific enquiries on supply pressure tiers. • Supportive of self-governance status • Does not foresee any significant costs associated with the implementation of the modification.
National Grid Distribution	Oppose	d) - negative f) - negative	<ul style="list-style-type: none"> • Remains of the opinion that provision of pressure tier data is NOT a UNC matter, and consequently, feel it is inappropriate to include such provisions within Code, as these would be better dealt with through other routes. • Supportive of self-governance status. • Highlights the fact that the Workgroup struggled to justify achievement of any relevant objective, including d). • Believes that the modification would have an adverse impact of relevant objective f) on the grounds that it is inappropriate to include provisions within Code which

			<p>are not relevant UNC issues and are better dealt with through other Codes, in this case the SPAA.</p> <ul style="list-style-type: none"> • Potential for ongoing costs in order to provide the required information on a quarterly basis. • The required solution was developed and the required pressure tier data provided to Xoserve for onward dissemination to Shippers, Suppliers and MAMs prior to completion of the Workgroup Report – it has been indicated that this service would continue irrespective of whether it is incorporated in UNC or otherwise.
Northern Gas Networks	Oppose	d) – does not further	<ul style="list-style-type: none"> • The Distribution Networks (DNs) have already agreed to provide this data for the wider industry, as it is their understanding that it is primarily meter asset managers and suppliers rather than Users (shippers), that will utilise this information. • As the data is already being made available to relevant parties, the modification will NOT further any of the relevant objectives and therefore should not be implemented. • Agrees that self-governance status should apply. • As the DNs already supply the data they would face NO additional costs following implementation. • Expects to monitor access to the data to ensure that the manually intensive quarterly process to develop the report is cost effective. • Suggests that should it be established that the production and publication of the data is not utilised, it would be more cost effective to cease the service and free up the resources for other activities.
RWE npower	Support	d) - positive	<ul style="list-style-type: none"> • The modification provides an effective way to reduce the cost to the industry of abortive site visits, whilst also negating the need to make specific enquiries on supply pressure tiers. • Supports self-governance status. • Does not envisage any costs associated with the implementation of the modification.
Scotia Gas Networks	Oppose	d) – does not further	<ul style="list-style-type: none"> • Does not consider that the provision of pressure tier information is a UNC matter, and therefore does not further any of the relevant objectives. • Requests for pressure tier information are currently managed through the GT1 process, which includes SLAs for responses, and the data is typically exchanged between MAMs and Gas Transporters -

			<p>this process is not governed by UNC and involves non-UNC parties.</p> <ul style="list-style-type: none"> • Does not consider that the modification adequately assesses or justifies provision of the pressure tier information to the specified parties, namely Shippers, Suppliers and MAMs - this concern has been repeatedly raised during Workgroup development. • Whilst retaining concerns with the modification itself, recognises that pressure tier requests on a one-by-one basis may not always be ideal, especially in the circumstances where large volumes of site visits are required. • Has worked with the Proposer, Xoserve and the other GDNs to facilitate the provision of a large portion of pressure tier data in an effort to formulate a suitable. This has been completed and the solution is in place, in advance of the modification being implemented - to this end DNs have demonstrated a commitment to working constructively and cooperatively with fellow industry parties, and, in combination with the above concerns, consider this modification to be an inappropriate and unnecessary governance step. • Supportive of self-governance status. • Will continue to incur costs to gather and maintain the data over and above those costs already incurred through management of the GT1 process.(Xoserve has already incurred costs whilst setting up the data repository and will continue to do so whilst managing the publication process.) • A material reduction in GT1 requests would be expected now a larger proportion of the pressure tier data is available.
ScottishPower Energy Management Ltd	Support	d) – positive	<ul style="list-style-type: none"> • The modification provides an effective means of ensuring that operatives with the correct skills and equipment are sent to customer premises. • Will improve the customer experience whilst reducing any inconvenience to them. • Supports self-governance status. • Does not envisage any costs associated with the implementation of the modification.
SSE	Support	d) – positive	<ul style="list-style-type: none"> • The modification is an effective way of reducing the numbers of Supply Meter Point pressure enquiries and potential abortive site visits, which with the rollout of smart meters could become more significant.

			<ul style="list-style-type: none"> • Supports self-governance status. • Does not envisage any costs associated with the implementation of the modification.
Statoil UK Ltd	Support	d) – positive	<ul style="list-style-type: none"> • Potentially simplifies asset queries and speeds up the site works process. • Will help with the calculation of asset charges where National Grid Metering is the MAM, and where pressure tier is a factor. • Supports self-governance status. • Does not anticipate any (obvious) costs but does perceive more overall efficiencies.
Total Gas & Power	Support	d) – positive	<ul style="list-style-type: none"> • The modification will remove the need for individual MPRN enquiries via the GT1 process and helps to ensure accurate first time pricing where pressure tier is a factor in the metering charges. • Supports self-governance status. • No significant costs envisaged.
Wales & West Utilities	Oppose	d) – does not further	<ul style="list-style-type: none"> • The Distribution Networks are already making this information available to Suppliers and MAMs. It is recognised that this has happened since the modification proposal was first raised and it is suggested that since the Proposer has obtained the result desired, then there is NO benefit in proceeding with the modification. • Believes the only benefit in a formal obligation to provide this information would be if Parties believe that Transporters would cease to provide this information. • The information published should reduce the use of the GT1 process to obtain pressure tier information. • As the GT1 process is not recognised in the UNC, and no Party has ever raised a modification proposal to put it in the UNC, it cannot see the necessity of codifying the provision of the pressure tier information by post code. • If a codified obligation is required then it is suggested that this would be better placed in the SPAA. • Since the industry seems content with the GT1 process arguably a better approach would be to amend the GT1 document (GDN/PM/GT/1) to describe the provision of pressure tier information by post code - this would have the benefit that the processes associated with obtaining pressure tier

			<p>information were in one place.</p> <ul style="list-style-type: none"> • As the information requested is already available, the modification does not have a positive benefit on any relevant objective. • Agrees that this is a self-governance modification. • Whilst expecting to incur some costs associated with the regular quarterly provision of information, a corresponding fall in the number of GT1 requests is anticipated.
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Please note that late submitted representations will not be included or referred to in this Final Modification Report. However, all representations received in response to this consultation (including late submissions) are published in full alongside this Report, and will be taken into account when the UNC Modification Panel makes its assessment and recommendation.

Views expressed on the impacts to SPAA parties

Views on the impacts to SPAA parties	
Organisation	Key Points
Association of Meter Operators	<ul style="list-style-type: none"> • Through discussion suppliers/shippers will be able to appoint a MAM organisation that has the appropriate capabilities. • The provision of the pressure tier information allows the initial appointment to be directed to the correct party. • The Ofgem faster switching activity is reviewing the sources of information and the architecture of IT systems to deliver information to support Change of Supplier (CoS) and the inclusion of the pressure tier information (a GT owner data item) would be a major step forward to improve the provision of this information. • The Ofgem activity is also considering the different roles of Supplier and Shipper in the context of CoS. On CoS the new Supplier will be required to make an extremely fast decision on the new agents, provision of the pressure tier (for the reasons above) are a criterion in this selection, and therefore its inclusion in the GT dataset going forward is beneficial.
British Gas Trading	<ul style="list-style-type: none"> • Believes that the impact to them, as a supplier and a MAM, is that they have the opportunity to access pressure tier information to better manage site visits and avoid aborted visits. • Retrieving the information will be time consuming, unless internal systems are developed. • System development costs may restrict use of the data.
EDF Energy	<ul style="list-style-type: none"> • No specific comments/views provided.
ENGIE Gas Limited	<ul style="list-style-type: none"> • Whilst no specific comments/views provided, points out that they are not a full

	SPAA party, only an I&C TRAS signatory.
E.ON UK	<ul style="list-style-type: none"> • As Proposer, and following revisions to the modification through Workgroup development, considered whether to withdraw the UNC modification and raise a SPAA schedule. • Left this within the UNC for the following reasons: <ul style="list-style-type: none"> ○ Since not all suppliers are signatories to SPAA some suppliers would not be able to access the information if the change were introduced via SPAA, and therefore the GTs may be discriminating in terms of provision of information to SPAA parties by a self-serve route, but requiring non-SPAA parties to use the GT1 process - this could be considered anti-competitive and discriminatory. ○ The change related to providing information about the operation of the pipeline system and the transportation of gas, which is more generally a UNC matter between the transporter and the shipper rather than the transporter and the supplier. ○ The costs for the GT1 process are most likely to be recovered through transportation charges. Since the Transporters will benefit from a reduction in transportation costs in the longer term from the modification, the adjustment of costs should flow back through transportation charges, which ultimately benefits competition in both shipping and supply – which is a relevant objective of the Uniform Network Code. ○ Whilst not immediately relevant to the UNC modification, the governance and provision of centrally held data is changing and it is likely that these arrangements will be subsumed into the future Central Data Service Provider (CDSP).
ESP Pipelines	<ul style="list-style-type: none"> • Suggests there is a concern that this could be used adversely to help with smart meter rollout for smaller parties (and larger for that matter).
Gazprom Energy	<ul style="list-style-type: none"> • No specific comments/views provided.
National Grid Distribution	<ul style="list-style-type: none"> • Believes that the parties having a principal interest in receiving pressure tier data are Suppliers and MAMs. • Whilst Transporters have agreed to provide this information (via our Agency Xoserve) on a voluntary basis, if the Proposer believes that further governance is required to ensure the ongoing provision of the data then a SPAA change would be required. • Believes that the UNC Modification, should it be directed for implementation, would only enable access to Shipper Users.
Northern Gas Networks	<ul style="list-style-type: none"> • Pressure data is required by meter asset managers (MAMs) and suppliers to comply with their obligations associated with meter installation. As MAMs and suppliers are not party to the UNC, it does not believe that Modification 0526 is in the appropriate governance arena. • Should an obligation for publication of data be necessary then it would be better placed in the SPAA as this would be more visible to the relevant parties.

	<ul style="list-style-type: none"> • Points out that in order to ensure that relevant parties are aware of the availability of the reports that DNs are already publishing it has been necessary to send notification of how to access the data through a SPAA distribution list to reach the correct parties.
RWE npower	<ul style="list-style-type: none"> • No specific comments/views provided.
Scotia Gas Networks	<ul style="list-style-type: none"> • It is not necessary to use governance procedures to place an obligation on GDNs to provide this data, as this is already facilitated through the GT1 process. • However, on the basis that the modification to the UNC has been pursued, would have expected equivalent consideration to be given to the other relevant Codes, including SPAA and MAMCoP. • In suggesting that the modification stipulates that access should be provided to Shippers, Suppliers and MAMs, and therefore if it is felt that a formal change is required to one Code, there would be an expectation to see a reflection in the others, to ensure that all recipients of the data are captured.
ScottishPower Energy Management Ltd	<ul style="list-style-type: none"> • No specific comments/views provided.
SSE	<ul style="list-style-type: none"> • No specific comments/views provided.
Statoil UK Ltd	<ul style="list-style-type: none"> • No specific comments/views provided, points out that they are only an I&C TRAS signatory.
Total Gas & Power	<ul style="list-style-type: none"> • Whilst no specific comments/views provided, points out that they are not fully signed up to SPAA, only for I&C TRAS purposes.
Wales & West Utilities	<ul style="list-style-type: none"> • As the main beneficiaries of this information will be suppliers and MAMs then, if a formal obligation is required, the obligation should be in SPAA which is an agreement between Transporters and Suppliers - this would mean that it covered iGTs as well as large transporters. • Since large transporters are currently providing this information a formal obligation is not believed to be required. • Under the Code Governance Review 3 final proposals it is believed that this modification proposal would have been identified as a cross code modification and SPAA may well have been identified as the appropriate lead Code.

9 Panel Discussions

The Panel Chair summarised that Modification 0526S proposes to formalise the communication process with regard to the provision of and accessibility to information relating to meter points and associated Supply Meter Point Pressure Tiers by the Gas Transporter (GT) to the Shipper/Supplier/MAM (noting that GTs currently provide this information using the proposed process on a voluntary basis). Gas Transporters (excluding National Grid NTS) will be required to publish an electronic list of the relevant pressure tier applicable to the MPRNs (including those without a meter attached) on their network(s) by post code, and to make it available to relevant industry parties, (the list to be refreshed on a quarterly basis). It is necessary for Shippers, Suppliers and Meter Asset Managers to understand the pressure tier at a given meter point so that appropriately skilled staff and equipment can be deployed to carry out any work on it. This pressure tier information process will be additional to the current GT1 process.

Members considered the representations made noting that of the 16 representations received, 10 supported implementation, 1 offered qualified support and 5 were not in support.

Noting the disparate views expressed by respondents, the Chair asked Members to focus on the relevant objectives and, in particular, whether the arguments presented in this report furthered them.

Consideration of Relevant Objectives

Prior to consideration of individual relevant objectives, a number of Members contended that it is inappropriate to include such provisions within Code as provision of pressure tier data was not a UNC matter, and therefore this modification does not further any of the UNC's relevant objectives. If a codified obligation is required then it was suggested that this would be better placed in the SPAA as Suppliers and MAMs would be the main beneficiaries.

It was pointed out that requests for pressure tier information are currently managed through the GT1 process, which includes Service Level Agreements (SLAs) for responses, and that the data is typically exchanged between MAMs and Gas Transporters. It was noted that the GT1 process is not recognised in the UNC. This particular process involves non-UNC parties and is not governed by the UNC, and as such it was believed that this would be better dealt with through other means/codes. Some Members did not consider that the modification sufficiently justified the provision of the pressure tier information to the specified parties, namely Shippers, Suppliers and MAMs and that the benefits of implementation had not been established.

It was noted that the Distribution Networks (DNs) had already agreed to provide this data for the wider industry on a voluntary basis, as it was their understanding that it is primarily Meter Asset Managers (MAMs) and Suppliers rather than Users (Shippers) who will utilise this information. As the data is already being made available to relevant parties (Suppliers and MAMs), it could be argued that this modification will not further any of the UNC relevant objectives and does not have a positive benefit on any relevant objective. The only benefit in formalising an obligation to provide this information would be to counterbalance any substantiated belief that the DNs would cease to provide this information and, again, this could be argued that the obligation should reside within an appropriate industry code other than UNC. From this standpoint it could be considered that continuing with this modification would be an inappropriate and unnecessary governance step.

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.**

Some Members believed that the modification would have a positive impact on relevant objective d), noting that implementation would improve competition between Shippers and Suppliers by helping to ensure accurate first time pricing where pressure tier is a factor in the metering charges, and reducing cost inefficiencies associated with abortive visits and failed appointment costs paid to customers. This will have the added benefits of contributing to a better end customer experience and of improving reputations.

However, other Members expressed a contrary view, reiterating that provision of this information was not a UNC matter, that it is inappropriate to include such provisions within Code, and therefore this modification does not further any of the relevant objectives, including relevant objective d).

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

Referring to the same primary argument as demonstrated above, on the grounds that it is inappropriate to include provisions within Code that are not relevant UNC issues (and that and these are better dealt with through different industry codes), some Members believed that the modification would have an adverse impact on relevant objective f), detracting from efficiency. However, others argued that as the information is currently being provided, implementing into Code would not detract from efficiency and its impact would be at least neutral and at best positive, as it would provide certainty.

Costs will continue to be incurred to gather and maintain and publish the data over and above those costs already incurred through management of the GT1 process; costs associated with GT1 process may be expected to reduce over time, but as this is not a UNC process arguably a perceived reduction in any such costs confers no benefit to parties under UNC, unless indirectly. The Proposer's view that costs for the GT1 process are most likely to be recovered through transportation charges was noted. It could be construed that since the Transporters benefit from a reduction in transportation costs in the longer term, the adjustment of costs should flow back through transportation charges, which ultimately benefits competition in both shipping and supply – which is a relevant objective (d) of the Uniform Network Code.

Other Members noted that with the roll out of SMART metering, this process would provide a simple, reliable route for the provision of relevant pressure tier information and ensure its continuation at a critical time as the industry embarks on a substantial meter exchange programme.

Views expressed on the impacts to SPAA parties

In the consultation, respondents were asked to provide views on the impacts to SPAA parties.

Members then considered the views expressed in response to the consultation question, noting that a number of respondents indicated that they were not full SPAA parties and therefore SPAA may not be an appropriate forum.

It was accepted that provision of the information may offer a positive support to faster switching activity, contributing to better management of site visits. Whilst not immediately relevant to the UNC, it was noted that the governance and provision of centrally held data is evolving and it is likely that these arrangements will be subsumed into the future Central Data Service Provider (CDSP).

It was also noted that parties having a principal interest in receiving/accessing pressure tier data are Suppliers and MAMs, who require this to comply with their obligations associated with meter installation. MAMs and suppliers are not parties to the UNC. As the main beneficiaries of this information will be Suppliers and MAMs then, if a formal obligation was required and to be mandated, it could be argued that the obligation should more appropriately reside in SPAA, which is an agreement between Transporters and Suppliers, and this would have the advantage of encompassing iGTs as well as large Transporters.

It was further noted that in order to ensure that relevant parties are aware of the availability of the reports that the DNs were already publishing it had been necessary to send notification of how to access the data through a SPAA distribution list rather than a UNC distribution list to reach the correct parties; this action in itself might contribute to the view that the UNC was not the most appropriate governance route to seek to impose obligations on DNs to provide this data (already facilitated through the GT1 process).

Summary

The Chair summarised that, since it has been confirmed that the large Transporters are currently providing this information, a formal obligation mandated through the UNC is not believed to be required.

Should an obligation for publication of data be necessary then it would be better placed in the SPAA as this would be more visible to the relevant parties.

Panel Determinations

Members voted with 4 votes in favour (out of a possible 11), not to implement Modification 0526S.

10 Panel Decision

Panel Decision

Having considered the Modification Report, the Panel determined that:

- proposed self-governance Modification 0526S should not be made.