

UNC Workgroup 0431S Agenda Shipper/Transporter – Meter Point Portfolio Reconciliation

Thursday 23 May 2013

at ENA, Dean Bradley House, 52 Horseferry Road, London SW1P 2AF

Attendees

Bob Fletcher (Chair)	(BF)	Joint Office of Gas Transporters
Mike Berrisford (Secretary)	(MB)	Joint Office of Gas Transporters
Alan Raper	(AR)	National Grid Distribution
Alex Ross-Shaw	(ARS)	Northern Gas Networks
Andrew Margan	(AM)	British Gas
Andrea Varkonyi*	(AV)	First Utility
Chris Hill	(CH)	Cornwall Energy
Chris Warner	(CW)	National Grid Distribution
Colette Baldwin	(CB)	E.ON UK
David Addison	(DA)	Xoserve
Dave Corby*	(DC)	National Grid Transmission
David Mitchell	(DM)	Scotia Gas Networks
Edward Hunter	(EH)	RWE npower
Erika Melén	(EM)	Scotia Gas Networks
Gareth Evans*	(GE)	WatersWye Associates
Hilary Chapman	(HCh)	Xoserve
Huw Comerford*	(HC)	Utilita
Mark Jones	(MJ)	SSE
Robert Cameron-Higgs*	(RCH)	Wales & West Utilities
Tom Breckwoldt	(TB)	Gazprom Energy

* via teleconference

Copies of all papers are available at: www.gasgovernance.co.uk/0431/230513

The Workgroup Report is due to the UNC Modification Panel on 16 July 2013.

1.0 Review of Minutes and Actions from previous meeting

1.1. Minutes

The minutes of the previous meeting were accepted.

1.2. Actions

No outstanding actions for review.

2.0 Discussion

Opening, BF advised that the draft Workgroup Report had been published the previous week and included suggested text. However, a formal request for the provision of legal text was made at the 16 May Panel meeting.

3.0 Workgroup Report

The Workgroup Report (v0.3) was reviewed onscreen with the key following points being discussed.

Section 1 – Summary

During a brief discussion it was agreed that the modification no longer satisfies the self-governance criteria and would be best amended accordingly, though it was recognised that only the Modification Panel or Ofgem could amend the status.

Section 2 – Why Change?

May possibly require some subtle changes in due course.

Section 3 – Solution

Opening, BF suggested that the Proposer should look to refine (strip down) this section whilst some concerns were voiced around Xoserve being able to register the information and the potential impact this could have on Shipper systems.

In considering the detailed business rules, it was noted that BR1 would need updating in due course and would possibly benefit by having a timeline added. In considering BRs 6 and 7, it was pointed out that this would provide for potentially a 75 business day window, for Shipper registration of the MPRNs.

In considering BR8, it was suggested that care would be needed to avoid confusing this with a Meter Point Creation request.

It was pointed out that should the modification no longer be deemed a self-governance modification then consideration of the implementation timings (with a possible 01/11/13 date) would be needed, especially when taking account of the fact that the UKLC have approved the implementation of the forced confirmation process for 02/10/13.

Section 5 – Implementation

It was considered that should the modification be deemed to be no longer a self-governance modification then the proposed timescales could / would be tight. EM agreed to consider, and amend accordingly.

Section 6 – Legal Text

During a walk through of the legal text provided by DM, the following points were discussed:

2.12.4 – it was confirmed that Meter Post Code is the same as a post code and where no meter is in situ at the MPRN, the field would be left blank;

2.12.6 – amend to read as ‘confirm’ rather than ‘identify’;

2.13.1 – current defined term for “**Reconciliation Report**” is too similar to other reconciliation style reports so may consider changing this title;

2.13.2(a) – may require a ‘catch all’ addition to cater for transitional changes and multiple portfolio impacts which could necessitate an additional report to identify these instances / scenarios. In acknowledging that the data set may be limited, DA felt the aim is to get the meter information into a respective parties portfolio;

2.13.2(a)(iii) – the issue of matching supply meter points to the supply point register was discussed (i.e. instances where meter points are on the central system but are not directly attributable to a Supplier).

EM advised that whilst this had been discussed previously it had been decided that it falls outside the scope of this modification at this time, as the main purpose of the modification is to target unregistered sites, although she will now discuss the points raised with Xoserve and provide a view at the next meeting. Whilst it was suggested that issuing the Shipper portfolio DVD at the same time as the proposed reconciliation report would allow parties to ‘match’ their data, it was felt that this would not readily resolve the erroneous sites issues.

It was noted that parties always have the option of raising any alternative modification should they feel the need.

2.13.6 – some questions asked as to what is actually expected of Xoserve in respect of this business rule (i.e. Xoserve write to Suppliers and where they (the Suppliers) indicated that there is nothing to register, that is the end of the process).

Some wondered whether or not the current drafting sufficiently caters for records that are incorrectly included on a Suppliers portfolio / billing system (i.e. if not a registered Supplier you would not be able to source the information as you have no rights of access to the site in question) – it was suggested that where the Supplier informs Xoserve that it is a zero billed customer, they (the Supplier) can respond in accordance with paragraph 2.13.6. DA believed that, if this was the case then paragraph 2.13.6 would benefit from being amended to provide for two options (i.e. where the Supplier identifies that Supply Meter Point Reference Number is not on their portfolio, or alternatively, they believe they need more time to investigate the matter).

However, it was also suggested that investigation and resolution of this type of issue ultimately sits within the Transporters obligations – EM advised that she would consider the matter and possibly tweak the wording in paragraph 2.13.7 to suit;

2.13.8 – again raises similar issues to 2.13.6 around the Supplier not being registered and therefore unable to source the information;

2.13.10 – When asked, EM confirmed that it is expected that the reports would be published on a suitable web site such as the Joint Office of Gas Transporters;

2.14.2 – some concerns voiced that this could be potentially discriminatory between Suppliers. However, it was acknowledged that whilst it is a very difficult to mandate Suppliers through Code provisions, there are alternative paths to addressing the discriminatory issue – in essence the matter boils down to whether or not it is viewed as due / undue discrimination.

It was also noted that anything that impacts upon the extraction timeline could also have a significant impact on the overall process.

In considering what to do when a Supplier refuses to carry out the Transporter request for information, it was suggested that Shippers would need to ensure that this is reported to the appropriate parties – it was also recognised that there are other routes available for reporting such matters under the general regime provisions and that Suppliers would run the risk of invoking the wrath of Ofgem. In accepting that there could be resourcing issues that mean that Suppliers / Shippers are unable to respond in the timeframes requested (i.e. resolving data mismatches etc.), it was pointed out that the proposed 75 business day window should be sufficient for the majority of instances, and finally

2.14.4 – it was felt that it is unclear what this paragraph is seeking to achieve but was probably best left as an automated report facility. Furthermore, it was noted that reports that go to Ofgem would not be anomalised, but that they (Ofgem) would need to consider commercial sensitivities when voicing their opinion on these types of issue.

In closing, it was agreed that both the legal text and the modification would now be amended in line with discussions and in time for sign off at the next meeting.

4.0 Any Other Business

None.

5.0 Workgroup Process

5.1 Agree actions to be completed ahead of the next meeting

No new actions were assigned during the meeting.

6.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/Diary

The next meeting will take place within the business proceedings of the Distribution Workgroup on:

Thursday 27 June 2013, at 10:30 ENA, 52 Horseferry Road, London SW1P 2AF.

Thursday 25 July 2013 at 10:30, Consort House, 6 Homer Road, Solihull, B91 3QQ.