

UNC Modification Proposal 0565 - Central Data Service Provider – General framework and obligations

UNC Workgroup – 6th January 2016

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Proposed UNC framework

- Aligned to GT Licence conditions
- UNC to have general provisions to include the CDSP and reflect CDS services
 - Will need to include the concept of non-CDSP services for NTS Capacity (aligns to GT Licence)
- UNC to address process, governance and charging arrangements associated with the CDSP
- Code parties (GTs iGTs and Shipper Users) required to enter into a Data Services Contract (DSC) with CDSP to deliver relevant services to them
 - UNC would contain obligation for parties to sign onto and comply with the DSC (would also form additional User accession requirement)
 - Consequences of breach UNC matter to be developed by 0565 workgroup
- Delivery of services to Transporters and Users to be addressed. UNC TPD V6.5 and relevant UNC sections likely to need amendment
 - This will need to be reflected within the DSC contract Shippers and Transporters will have with the CDSP

Approach to UNC change

- UNC services presently provided by Xoserve as GT Agency will be contracted for directly under new DSC
 - DSC parties will be CDSP (Xoserve and GTs, iGTs and Shippers)
- CDSP services will be those of UK-Link (computer and IX systems including data flow handling)
- Xoserve as CDSP will be contracting as ‘Principal’ not as Transporter Agency
- UNC needs to reflect change in legal status of Xoserve in providing UK-Link services
 - TPD V6.5 needs to change from concept of agency to reflect that functions and activities of Xoserve are performed by them as Service Provider under DSC.
 - Existing UNC references to Transporter/s in context of UK-Link services needs to change
 - No longer responsibility of Transporters to provide systems to support UNC
 - Legally incorrect to refer to Transporter (or Transporters) e.g. ‘counter party’ to SPA communications with Shippers

Approach to UNC change

- UNC TPD 6.5
 - Core functions and activities performed by Xoserve unlikely to differ from existing activities in TPD V6.5.2
 - Energy Balancing and other Transmission related activities will remain with NG NTS. In this case where Xoserve interfaces with other UNC parties, it will act as sub-contractor for NTS. Continuing agency role will need to be captured in amended TPD V6.5
- References to Transporter (or Transporters) in UNC will need to be changed to CDSP to reflect that it will be Xoserve as the directly contacted service provider who will operate the systems and handle data flows
- Not appropriate to refer to ‘Shippers’ rather than CDSP
 - Shippers will not be operating the systems and giving and receiving communications
 - Need to avoid prejudicing coherence of provisions dealing with UK-Link services



Approach to UNC change

- Examples:

- (a) G1.6.2 - "... CDSP [Shippers?] will determined the Provisional Annual Quantity ...";
- (b) G1.6.3 – "... CDSP [Shippers?] shall ... notify to the Registered User the Provisional Annual Quantity":
- (c) G1.6.13 – "... the Registered User may not later than ... notify to CDSP [Shippers?] that the Registered Shipper considers the Annual Quantity of that Supply Meter Point fails to satisfy the requirement ...";
- (d) G2.3.4 – "... CDSP [Shippers?] will submit a Supply Point Offer ..."; and
- (e) G2.5.1 – "A User may submit a Supply Point Confirmation to CDSP [Shippers?] ...".



Approach to UNC change

- Existing Transporter SPA obligations predicated on ‘singular entity’ i.e. whose system the Supply Point is located. Not legally sustainable for requirement to fall on a collection of Shippers (UNC architecture does not recognise this)
- Where UNC recognises collective Transporter obligations, this reflects requirements of DN sale/separation
 - GT Licences modified to contain collective requirements on Transporters e.g. joint governance, Agency and joint UNC governance
 - Limited in number; majority of UNC obligations apply to individual Transporters
- Process of identifying which UNC party is ‘beneficiary’ of particular UK-Link service will be reflected in DSC
 - Not prejudiced by referring to CDSP as ‘counterparty’ to any UK-Link service related rule in UNC



Approach to UNC change

- Change is fundamentally about identifying CDSP as the correct ‘counterparty’ to the UK-Link service related rule
 - Does not change the underlying rights and obligations in UNC as being between Transporters and Shippers
- UNC governance rules not required to change



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Realignment of obligation - example scenarios

G2.8.3 Where a User submits a Supply Point Objection to the ~~Transporter~~ CDSP:

(b) the ~~Transporter~~ CDSP will, as soon as reasonably practicable..... notify such objection..... to the Proposing User

(d) the objecting User will declare in the objection the reason for its objection and if the objecting User fails to do so the ~~Transporter~~ CDSP may reject such Supply Point Objection

Approach:

Replace Transporter with CDSP and reflect that CDSP is undertaking on behalf of Users in V6.5



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Realignment of obligation - example scenarios

M3.8.5where an Opening Meter Reading is not provided to the ~~Transporter~~ CDSP by the date required.....:

(b) the ~~Transporter~~ CDSP shall not later than 15 Supply Point Systems Business Daysprovide such notional Meter Reading to the Proposing User and the Withdrawing User as an estimated Meter Reading.

Approach:

Replace Transporter with CDSP and reflect that CDSP is undertaking on behalf of Shippers in V6.5



Realignment of obligation - example scenarios

G1.6.6 The ~~Transporter~~ **CDSP** will notify the Annual Quantity, and if relevant that the Annual Quantity has crossed a threshold requirement for the purposes of paragraph 1.6.15, to the Registered User.....

1.6.24 The ~~Transporter~~ **CDSP** will reject a request for a change in the Annual Quantity where:

(a) The ~~Transporter~~ **CDSP** is not reasonably satisfied that.....

1.6.25 Within 2 Business Days of receipt of a request under paragraph 1.6.20 or 1.6.22 the ~~Transporter~~ **CDSP** will notify the User if the request is accepted or rejected

Approach:

Replace Transporter with **CDSP** and reflect that CDSP is undertaking on behalf of Users in V6.5



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Realignment of obligation - example scenarios

M1.6.9 The Registered User will co-operate with the **CDSP**:

(a) in enabling access (where required) to Supply Meters for the purposes of.....

1.6.10 The Registered User of a NDM Supply Point at which Remote Meter Reading Equipment specified.....where requested to do so by the ~~Transporter~~ **CDSP**:

Approach:

Replace Transporter with **CDSP** and reflect that CDSP is undertaking on behalf of Users in V6.5



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Realignment of obligation - example scenarios

U1.1.1 The **CDSP** will secure the establishment and operation of UK Link, and will afford to **Transporters and** Users access to and use of UK Link, and each Transporter and each User will communicate with each other by means of UK Link, subject to and in accordance with this Section U.

Approach:

Replace Transporter (in first sentence) with **CDSP** and reflect that CDSP is undertaking on behalf of Transporters and Users in V6.5



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Realignment of obligation - example scenarios

U2.3.2 Upon request by a UK Link User (by notice to the CDSP and otherwise subject to and in accordance with the UK Link Manual), the CDSP will provide on hire any CDSP Available Equipment and/or supply CDSP Available Software.

Approach:

Replace Transporter with CDSP and reflect that CDSP is undertaking on behalf of Transporters and Users in V6.5



Summary of considerations and requirements for workgroup

- UNC changes are primarily 'legal' in nature
- Need to remove/amend UNC TPD V6.5 to reflect changed circumstances under FGO
- Need to agree UNC pre-requisites to enable DSC development to commence
 - Endorse principle that it is necessary for individual parties to physically sign DSC (based on legal advice)
- Commission lawyers to undertake review of UNC based on identifying where change to reflect CDSP is necessary
 - Need to examine TPD Section U to identify what is core UNC and what can potentially be moved to DSC
- Commission lawyers to produce specification for DSC which will aid UNC drafting
- Table risks/issues log and share/report progress.