

Stage 02: Workgroup

0416S:

Extending the data provision permissions created by Modification 0279 regarding historic asset and read data provision

This modification seeks to extend the data provision permissions created by Modification 0279 and permit the release of data as an ongoing arrangement rather than the existing annual arrangement. In addition two non-Code User Pays services shall be created for a monthly and quarterly service.



The Workgroup recommends that this self-governance modification should proceed to Consultation.



High Impact: -



Medium Impact: -



Low Impact: Shippers and Xoserve

At what stage is this document in the process?



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About this document:

The purpose of this report is make a recommendation to the Panel, to be held on [21 June 2012], on whether this modification is sufficiently developed to proceed to consultation and to submit any further recommendations in respect of the definition and assessment of this self-governance modification.



3 **Any questions?**

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1 Summary

Is this a Self-Governance Modification?

The Modification Panel determined that this is a self-governance modification.

Why Change?

Currently the UNC provides for an annual service for the provision of the historic asset and read information to Shippers. However, Shippers have advised that data issues with recently acquired sites could be resolved sooner if this historic asset and read information was available throughout the year. The resolution of discrepancies in asset data and the provision of historic read information will assist Shippers with the AQ review. It is the Proposer's view that Modification 0279 originally intended to create general permissions for release of this data (rather than just an annual service), but that the legal text was required to be prescriptive to the wording of the Modification and only the annual service was created.

Solution

There are 2 key component parts to the solution of this modification:

- 1) Amendment to UNC TPD Section V to create the necessary permissions for the historic data to be provided to the current Registered User; and
- 2) An amendment to TPD section G1.6.21 – G1.6.25 to remove the annual service from the UNC.

In addition, and outside of the UNC, two Non-Code User Pays services are to be created, an annual monthly service (12 reports per year) for the forthcoming year, and an annual quarterly service (4 reports per year) for the forthcoming year. On implementation of this modification the two Non-Code services will be added to the Services Schedule for the Provision of Non-Code User Pays Services and included in the Agency Charging Statement (in conjunction with any necessary discussions with the User Pays User Committee).

The file format for the Non-Code User Pays Services will be the same as that provided for Modification Proposal 0279 (i.e. no development required).

This historic data can be provided for a maximum period of three years prior to the current Registered Users confirmation effective date.

Note: sites connected directly to the NTS are excluded from this proposal.

Impacts and Costs

There are no development or implementation costs associated with the proposed changes to the UNC.

Two new Non-Code User Pays Services will be created:

- i) an annual monthly service (12 reports per year), and;
- ii) an annual quarterly report (4 reports per year).

The report has already been developed under Modification 0279, so any additional costs will be associated with the delivery of the report on a more frequent basis.

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Implementation

As this is a self-governance modification, implementation could be 16 business days after a Modification Panel decision to implement.

The Case for Change

Shippers have advised that on acquiring a site they are unable to assess if there are any data discrepancies until receipt of the annual report in May or June each year. The ability to request and be provided with this data throughout the year will lead to a quicker resolution of data discrepancies and minimise the impact of such data discrepancies.

Recommendations

The Workgroup considers that the self-governance modification is sufficiently developed and should now proceed to consultation.

2 Why Change?

Currently the UNC provides for an annual service for the provision of the historic asset and read information to Shippers. However, Shippers have advised that data issues with recently acquired sites could be resolved sooner if this historic asset and read information was available throughout the year. The resolution of discrepancies in asset data and the provision of historic read information will assist Shippers with the AQ review. It is the Proposer's view that Modification 0279 originally intended to create general permissions for release of this data (rather than just an annual service), but that the legal text was required to be prescriptive to the wording of the Modification and only the annual service was created.

3 Solution

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The file format for the Non-Code User Pays Services will be the same as that provided for Modification Proposal 0279 (i.e. no development required).

This historic data can be provided for a maximum period of three years prior to the current Registered Users confirmation effective date.

Note: sites connected directly to the NTS are excluded from this proposal.

For information and as an example, if a User requests the annual monthly service commencing in April the process would be as follows:

On the first business day in May 2012 the system is programmed to identify and supply points gained in the month of April 2012. The system will then retrieve the historic meter asset and read information for these Supply Points going as far back as the 1st May 2009. This data will be formatted and provided to the User as soon as reasonably practicable. And so on for the remainder of the period. There may be occasions during the year, e.g. the Annual Quantity review activities that occur at the end of September and start of October each year that mean the report may be delayed by a few days.

4 Relevant Objectives

Impact of the modification on the **Relevant Objectives: d) and f)**

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.	Yes
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.	Yes
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

Achievement of relevant objective (d)(i) "Securing of effective competition between relevant Shippers"

Incoming shippers would have access to meter read history and meter asset information to enable a more thorough AQ review process than is currently the case. The current inequity would be removed in that there would be a level playing field for incoming shippers relative to incumbent shippers such that all shippers have access to relevant information on which to base their customers AQ and this information would be available throughout the year (rather than limited to a single annual report).

Achievement of relevant objective (f) "Promotion of efficiency in the implementation and administration of the Code"

By allowing Shippers to access this data throughout the year, rather than solely via an annual report, will give them greater ability to carry out UNC processes and validation with the most accurate data and therefore will assist with the furtherance of this relevant objective.

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5 Impacts and Costs

Consideration of Wider Industry Impacts

There are no impacts to wider industry development.

Costs

Indicative industry costs – User Pays	
Classification of the modification as User Pays or not and justification for classification	
This is not a User Pays modification. Non-Code User Pays services will be created if implemented, however this is outside of the UNC process.	
Identification of Users, proposed split of the recovery between Gas Transporters and Users for User Pays costs and justification	
Not applicable	
Proposed charge(s) for application of Users Pays charges to Shippers	
Not applicable	
Proposed charge for inclusion in ACS – to be completed upon receipt of cost estimate from Xoserve	
Not applicable	

Impacts

Impact on Transporters' Systems and Process	
Transporters' System/Process	Potential impact
UK Link	<ul style="list-style-type: none"> None
Operational Processes	<ul style="list-style-type: none"> None
User Pays implications	<ul style="list-style-type: none"> None

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	<ul style="list-style-type: none"> None
Development, capital and operating costs	<ul style="list-style-type: none"> None
Contractual risks	<ul style="list-style-type: none"> Potentially minimises these risks
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> None

Impact on Transporters	
Area of Transporters' business	Potential impact
System operation	• None
Development, capital and operating costs	• None
Recovery of costs	• None
Price regulation	• None
Contractual risks	• None
Legislative, regulatory and contractual obligations and relationships	• None
Standards of service	• None

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	• None
UNC Committees	• None
General administration	• None

Impact on Code	
Code section	Potential impact
Section V	• Amendment to permit the release of data
Section G	• Amendment to remove the Annual service

Impact on UNC Related Documents and Other Referenced Documents	
Related Document	Potential impact
Network Entry Agreement (TPD I1.3)	• None
Network Exit Agreement (Including Connected System Exit Points) (TPD J1.5.4)	• None
Storage Connection Agreement (TPD R1.3.1)	• None
UK Link Manual (TPD U1.4)	• None
Network Code Operations Reporting Manual (TPD V12)	• None

Impact on UNC Related Documents and Other Referenced Documents	
Network Code Validation Rules (TPD V12)	• None
ECQ Methodology (TPD V12)	• None
Measurement Error Notification Guidelines (TPD V12)	• None
Energy Balancing Credit Rules (TPD X2.1)	• None
Uniform Network Code Standards of Service (Various)	• None

Impact on Core Industry Documents and other documents	
Document	Potential impact
Safety Case or other document under Gas Safety (Management) Regulations	• None
Gas Transporter Licence	• None

Other Impacts	
Item impacted	Potential impact
Security of Supply	• None
Operation of the Total System	• None
Industry fragmentation	• None
Terminal operators, consumers, connected system operators, suppliers, producers and other non code parties	• None

6 Implementation

As self-governance procedures are proposed, implementation could be 16 business days after a Modification Panel decision to implement.

7 The Case for Change

There are no further additions to the case for change outlined above.

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8 Legal Text

Draft Text

[The following Draft Legal Text was prepared by Wales & West Utilities, and no issues were raised by the Workgroup regarding its content.]

9 Recommendation

The Workgroup invites the Panel to:

- AGREE that this self-governance modification should be submitted for consultation.