

Change Proposal

UNC Modification 0619 - Application of proportionate ratchet charges to daily read sites

Mod reference: 0619
CDSP Reference: XRN4347

| Document Stage | Version | Date | Author | Status |
|-------------------------------------|---------|----------|----------------|-----------------|
| ROM Request / Change Proposal | V0.1 | 16/08/17 | Murray Thomson | Draft |
| ROM Response | | | | Choose an item. |
| Change Management Committee Outcome | | | | Choose an item. |
| EQR | | | | Choose an item. |
| Change Management Committee Outcome | | | | Choose an item. |
| BER | | | | Choose an item. |
| Change Management Committee Outcome | | | | Choose an item. |
| CCR | | | | Choose an item. |
| Change Management Committee Outcome | | | | Choose an item. |

Document Purpose

This document is intended to provide a single view of a change as it moves through the change journey. The document is constructed in a way that enables each section to build upon the details entered in the preceding section. The level of detail is built up in an incremental manner as the project progresses.

The template is aligned to the Change Management Procedures, as defined in the CDSP Service Document. The template is designed to remove the need for duplication of information. Where information is required in one section but has been previously captured in a previous section, the previous section will be referenced.

The summary table on the front page shows the history and the current status of the Change Proposal.

| Section | Title | Responsibility |
|-----------------|--|-----------------------------|
| 1 | Proposed Change | Proposer / Mod Panel |
| 2 | ROM Request / Change Proposal | Proposer / Mod Panel |
| 3 | ROM Request Rejection | CDSP |
| 4 | Rough Order of Magnitude (ROM) Analysis | CDSP |
| 5 | Change Proposal: Committee Outcome | Change Management Committee |
| 6 | EQR: Change Proposal Rejection | CDSP |
| 7 | Evaluation Quotation Report (EQR): Notification of delivery date | CDSP |
| 8 | Evaluation Quotation Report (EQR) | CDSP |
| 9 | Evaluation Quotation Report (EQR): Committee Outcome | Change Management Committee |
| 10 | Business Evaluation Report (BER) | CDSP |
| 11 | Business Evaluation Report (BER): Committee Outcome | Change Management Committee |
| 12 | Change Completion Report (CCR) | CDSP |
| 13 | Change Completion Report (CCR): Committee Outcome | Change Management Committee |
| 14 | Document Template Version History | CDSP |
| Appendix | | |
| A1 | Glossary of Key Terms | N/A |

Section 1: Proposed Change

Please complete section 1 and 2 and specify within section 2 the output that is required from the CDSP

| Originator Details | | | |
|--|---|--|------------------------------------|
| Submitted By | Murray Thomson | Contact Number | 0121 623 2092 |
| | | Email Address | murray.thomson@xoserve.com |
| Customer Representative | Steve Mulinganie | Contact Number | 07990 972568 |
| | | Email Address | steve.mulinganie@gazpromenergy.com |
| Subject Matter Expert/Network Lead | Richard Pomroy | Contact Number | 029 2027 8552 or 07812 973337 |
| | | Email Address | Richard.Pomroy@wutilities.co.uk |
| Customer Class | | | |
| | | <input checked="" type="checkbox"/> Shipper <input type="checkbox"/> National Grid Transmission <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> iGT | |
| Overview of proposed change | | | |
| Change Details | <p>The proposer feels that whilst ratchet charges are disproportionate...</p> <p>[a] The number of SMPs that may elect to become DM will be severely limited, reducing settlement accuracy and hampering the development of innovative granular market products.</p> <p>[b] Shippers are incentivized to be risk averse and over-book their capacity resulting in an inflated and distorted view of peak system requirements and potential denial of constrained capacity to those who need it and would use it.</p> <p>To make ratchet charges proportionate the proposer wishes to implement the principle that ratchet charges only recover the capacity revenue that would have been payable had the ratcheted SOQ applied from the start of the period that ratchets apply.</p> | | |
| Reason(s) for proposed service change | <p>The application of ratchet incentive charges (which we consider to be penal) to daily read sites seems disproportionate considering the potential future utilisation of daily read submission by a wide range of customers, including SME, Micro business and Domestic consumers in Product Class 2, who have low consumption levels and who we believe do not represent a risk to the safe operation of the network. As it currently stands therefore the current regime is likely to limit the number of sites that will seek to be daily read as the risks of incurring penal charges will outweigh the settlement benefits. For those sites that do elect to become daily read, it is likely that Shippers will continue (as they do now) to have to overestimate likely capacity requirements to minimise the risk of these penal charges being applied, resulting in an inflated view of peak system requirements which could lead to inefficient system investment.</p> | | |

| | |
|--|--|
| Status of related UNC Mod | At the time of writing this Change Proposal, the status of the Modification is 'Allocated to Workgroup' |
| Full title of related UNC Mod | UNC Modification 0619 - Application of proportionate ratchet charges to daily read sites |
| Benefits of change | NA |
| Required Change Implementation Date | October 2018 |
| Please provide an assessment of the priority of this change from the perspective of the industry. | <input type="checkbox"/> High <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Low Rationale for assessment: |

Section 2: Initial Assessment / ROM Request / Change Proposal

| | |
|---|--|
| Service Level of Quote/Estimate Robustness Requested | Evaluation Services <input type="checkbox"/> Initial Assessment (<i>Mod related changes only</i>) <input checked="" type="checkbox"/> ROM estimate for Analysis and Delivery CDSP Change Services <input type="checkbox"/> Firm Quote for Analysis <input type="checkbox"/> Firm Quote for both Analysis and Delivery |
| Has any initial assessment been performed in support of this change? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

| | |
|--|--|
| Is this considered to be a Priority Service Change? | <input checked="" type="checkbox"/> Yes (Mod Related) <input type="checkbox"/> Yes (Legislation Change Related) <input type="checkbox"/> No |
| Is this change considered to relate to a 'restricted class' of customers? <p style="color: purple; font-size: small;">Consider if the particular change is only likely to impact those who fall under a particular customer class</p> <p style="color: purple; font-size: small;">If it impacts all customer classes (i.e. Transmission, Distribution & Shippers) then choose 'No'.</p> | <input checked="" type="checkbox"/> Yes (please mark the customer class(es) to whom this is restricted) <input checked="" type="checkbox"/> No <hr style="border-top: 1px dashed black;"/> <input checked="" type="checkbox"/> Shippers <input checked="" type="checkbox"/> National Grid Transmission <input checked="" type="checkbox"/> Distribution Network Operators <input checked="" type="checkbox"/> iGT's |
| Is it anticipated that the change would have an adverse impact on customers of any other customer classes? <p style="color: purple; font-size: small;">Please refer to appendix one for the definition of an 'adverse impact'</p> | <input type="checkbox"/> Yes (please give details) <input checked="" type="checkbox"/> No |
| General Service Changes Only (please ensure that either A or B below is completed) | |
| A) Customer view of impacted service area(s) <p style="color: blue; font-size: small;">For a definition of the Service Areas, please see the 'Charge Base Apportionment Table' within the Budget and Charging Methodology. Please indicate the service area(s) that are understood to be impacted by the change. Please enter 'unknown' if relevant. Where the change is likely to impact more than one service area please indicate the percentage split of the impact across the impacted service areas. For example if it is split equally across two service areas then enter 50% in the 'split' against each service area.</p> | |
| 7. NTS Capacity, LDZ Capacity, Commodity, Reconciliation, Ad-hoc adjustment and balancing invoices (17% National Grid NTS, 83% DN Operators) | |
| B) If the change is anticipated to require the creation of a new service area and service line please | |

| |
|--|
| give further details stating proposed name of new service area and title of service line: |
| |
| Specific Service Changes Only: |
| Please detail the proposed methodology (or amendment to the existing methodology) for determining Specific Service Change Charges. |
| NA |
| Please detail the proposed basis (that is, Charging Measure and Charging Period) for determining Specific Service Change Charges in respect of the Specific Service. |
| NA |
| Impacts to UKLink System or File Formats |
| None identified |
| Impacts UKL Manual Appendix 5b |
| None identified |
| Impacts to Gemini System |
| None identified |
| Please give any other relevant information. |
| |

Please send the document to the following:

| Recipient | Email |
|---------------------------------------|------------------------------|
| Xoserve Portfolio Office | changeorders@xoserve.com |
| Change Management Committee Secretary | dsccomms@gasgovernance.co.uk |

Section 3: ROM Request Acceptance

| | |
|--|--|
| Is there sufficient detail within the ROM Request to enable a ROM Analysis to be produced? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| If no, please define the additional details that are required. | |

If the ROM Request is not accepted. Please forward this document to the Portfolio Office for onward transmission to the Change Management Committee

Section 4: ROM Analysis

This ROM is Xoserve’s response to the above Evaluation Service Request. The response is intended to support customer involvement in the development of industry changes.
Should the request obtain approval for continuance then a Change Proposal must be raised for any further analysis / development.

Disclaimer:

This ROM Analysis has been prepared in good faith by Xoserve Limited but by its very nature is only able to contain indicative information and estimates (including without limitation those of time, resource and cost) based on the circumstances known to Xoserve at the time of its preparation. Xoserve accordingly makes no representations of accuracy or completeness and any representations as may be implied are expressly excluded (except always for fraudulent misrepresentation).

Where Xoserve becomes aware of any inaccuracies or omissions in, or updates required to, this Report it shall notify the Network Operators’ Representative as soon as reasonably practicable but Xoserve shall have no liability in respect of any such inaccuracy or omission and any such liability as may be implied by law or otherwise is expressly excluded.

This Report does not, and is not intended to; create any contractual or other legal obligation on Xoserve.

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| ROM Analysis |
|---|
| <p>Change Assessment High level indicative assessment of the change on the CDSP service description, on UKLink and any alternative options if applicable</p> |
| <p>Change Impact: Initial assessment of whether the service change is / would have:</p> <ul style="list-style-type: none"> • a restricted class change, • a priority service change • an adverse impact on any customer classes |
| <p>Change Costs (implementation): An approximate estimate of the costs (or range of costs) where options are identified</p> |
| <p>Change Costs (on-going): The approximate estimate of the impact of the service change on service charges</p> |
| <p>Timescales: Details of timescale for the change i.e. 3months etc. Details of when Xoserve could start this change i.e. the earliest is release X.</p> |
| <p>Assumptions: Any key assumptions that have been made by Xoserve when providing the cost and or timescale</p> |
| <p>Dependencies: Any material dependencies of the implementation on any other service changes</p> |

Constraints:

Any key constraints that are expected to impact the delivery of the service change

Please send the document to the following:

| Recipient | Email |
|--------------------------|-----------------------------|
| Xoserve Portfolio Office | changeorders@xoserve.com |
| Requesting Party | As specified in ROM Request |

Section 5: Change Proposal: Committee Outcome

| | | | |
|---|--|-----------------------|--|
| The Change Proposal is approved. An EQR is requested | | | |
| Approved Change Proposal version | | | |
| The change proposal shall not proceed | | | |
| The committee votes to postpone its decision on the Change Proposal until a later meeting | | Date of later meeting | |
| The committee requires the proposer to make updates to the Change Proposal: | | | |
| Updates required: | | | |
| | | | |

Section 6: Evaluation Quotation Report (EQR): Change Proposal Rejection

| Change Proposal Rejection | | | | |
|---------------------------|------------|--|-----------|--|
| | Yes | | No | Is there sufficient detail within the Change Proposal to enable an EQR to be produced? If no, please provide further details below. |
| Further details required: | | | | |

Please send the document to the following:

| Recipient | Email |
|---------------------------------------|------------------------------|
| Change Management Committee Secretary | dsccomms@gasgovernance.co.uk |

**Section 7: Evaluation Quotation Report (EQR):
Notification of Delivery Date**

| Notification of EQR Delivery Date | |
|--|--|
| Original EQR delivery date: | |
| Revised EQR delivery date: | |
| Rationale for revision of delivery date: | |

Please send the document to the following:

| Recipient | Email |
|---------------------------------------|------------------------------|
| Change Management Committee Secretary | dsccomms@gasgovernance.co.uk |

Section 8: Evaluation Quotation Report (EQR)

| | | | |
|-----------------|--|----------------|--|
| Project Manager | | Contact Number | |
| | | Email Address | |
| Project Lead | | Contact Number | |
| | | Email Address | |

| | |
|--|--|
| Please provide an indicative assessment of the impact of the proposed change on: <ul style="list-style-type: none"> i. CDSP Service Description ii. CDSP Systems | |
| Approximate timescale for delivery of 'business evaluation report' (N.b this is from the date on which the EQR is approved.) | |
| Estimated cost of business evaluation report preparation This can be expressed as a range of costs i.e. 'at least £xx,xxx but probably not more than £xx,xxx'. | |
| Does the CDSP agree with the 'Restricted class change' assessment (where provided)? Please refer to detail provided in the Change Proposal | <input type="checkbox"/> Yes <input type="checkbox"/> No (please give detail below) |
| Does the CDSP agree with the 'Adverse Impact' assessment (where provided)? Please refer to detail provided in the Change Proposal | <input type="checkbox"/> Yes <input type="checkbox"/> No (please give detail below) |
| Does the CDSP agree with the 'Priority Service Change' assessment (where provided)? Please refer to detail provided in the Change Proposal | <input type="checkbox"/> Yes <input type="checkbox"/> No (please give detail below) |
| General service changes | |
| Does the CDSP agree with the assessment made in the Change Proposal regarding impacted service areas? This should refer to whether the proposing party | <input type="checkbox"/> Yes <input type="checkbox"/> No (please give detail below) |

| | |
|--|---|
| <p>considers the service change to relate to an existing service area or whether it constitutes a new service area.</p> | |
| <p>Specific service changes</p> | |
| <p>Does the CDSP agree with the proposal made in the Change Proposal regarding specific change charges?</p> <p>This should refer to the proposed methodology (or amendment to existing methodology) for determining the specific service charges and the proposed basis for determining the specific service change charges.</p> | <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No (please give detail below)</p> |
| <p>Please provide a draft amendment of the Specific Service Change Charge Annex setting out the methodology for determining Specific Service Change Charges proposed in the Change Proposal</p> | |
| <p>EQR validity period:</p> | |

Please send the document to the following:

| Recipient | Email |
|---------------------------------------|------------------------------|
| Change Management Committee Secretary | dsccomms@gasgovernance.co.uk |

Section 9: Evaluation Quotation Report: Committee Outcome

| | | | |
|---|---|-----------------------|--|
| The EQR is approved | | | |
| Approved EQR version | | | |
| The Change Proposal shall not proceed. The Change Proposal and this EQR shall lapse | | | |
| The committee votes to postpone its decision on the EQR until a later meeting | | Date of later meeting | |
| The committee requires updates to the EQR: | | | |
| Updates required: | | | |
| General service changes only | | | |
| <i>(The detail upon which the response will be based is originally defined in the change proposal and potentially commented upon in the subsequent EQR)</i> | | | |
| 1.) Does the committee agree with the assessment of the service area(s) to which the service line belongs and the weighting of the impact? | <input type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 2.) If no, please enter the agreed service area(s) and the weighting: | | | |
| Specific service changes only | | | |
| <i>(The detail upon which the response will be based is originally defined in the Change Proposal and potentially commented upon in the subsequent EQR)</i> | | | |
| 1.) Please confirm the methodology for the determination of Specific Service Change charges | | | |
| 2.) Please confirm the charging measure and charging period for the determination of Specific Service Change charges | | | |

Section 10: Business Evaluation Report (BER)

| | | | | | | | | | | |
|--|--|----------------------------|--|--|--|-------------|--|-------|--|----------|
| Change Implementation Detail | | | | | | | | | | |
| 1.) Detail changes required to the CDSP Service Description | | | | | | | | | | |
| | | | | | | | | | | |
| 2.) Detail modifications required to UK Link | | | | | | | | | | |
| | | | | | | | | | | |
| 3.) Detail changes required to appendix 5b of the UK Link Manual | | | | | | | | | | |
| | | | | | | | | | | |
| 4.) Detail impact on operating procedures and resources of the CDSP | | | | | | | | | | |
| | | | | | | | | | | |
| 5.) Implementation Plan | | | | | | | | | | |
| | | | | | | | | | | |
| 6.) Estimated implementation costs | | | | | | | | | | |
| | | | | | | | | | | |
| 6a.) How will the charging for the costs be allocated to different customer classes? (General Service Changes only) | | | | | | | | | | |
| <p>Please mark % against each customer class:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50px; border: 1px solid black; text-align: center;"> </td> <td>National Grid Transmission</td> </tr> <tr> <td style="border: 1px solid black; text-align: center;"> </td> <td>Distribution Network Operators and IGT's</td> </tr> <tr> <td style="border: 1px solid black; text-align: center;"> </td> <td>DN Operator</td> </tr> <tr> <td style="border: 1px solid black; text-align: center;"> </td> <td>IGT's</td> </tr> <tr> <td style="border: 1px solid black; text-align: center;"> </td> <td>Shippers</td> </tr> </table> <p><u>100%</u></p> | | National Grid Transmission | | Distribution Network Operators and IGT's | | DN Operator | | IGT's | | Shippers |
| | National Grid Transmission | | | | | | | | | |
| | Distribution Network Operators and IGT's | | | | | | | | | |
| | DN Operator | | | | | | | | | |
| | IGT's | | | | | | | | | |
| | Shippers | | | | | | | | | |
| 7.) Estimated impact of the service change on service charges | | | | | | | | | | |
| | | | | | | | | | | |
| 8.) Please detail any pre-requisite activities that must be completed by the customer prior to receiving or being able to request the service. | | | | | | | | | | |
| | | | | | | | | | | |
| Implementation Options | | | | | | | | | | |
| <p>Please provide details on any alternative solution/implementation options: This should include:</p> <ul style="list-style-type: none"> (i) a description of each Implementation Option; (ii) the advantages and disadvantages of each option (iii) the CDSP preferred Implementation Option | | | | | | | | | | |

Restricted Class Changes only

Is there any change in the view of the CDSP on whether there would be an 'Adverse Impact' on customers outside the relevant customer class(es)?

Yes (please give detail below)

No

Dependencies:

Constraints:

Benefits:

Impacts:

Risks:

Assumptions:

Information Security:

Out of scope:

Please provide any additional information relevant to the proposed service change:

Please send the document to the following:

| Recipient | Email |
|---------------------------------------|------------------------------|
| Change Management Committee Secretary | dsccomms@gasgovernance.co.uk |

Section 11: Business Evaluation Report: Committee Outcome

| | | | |
|---|--|-----------------------|--|
| The BER is approved and the change can proceed | | | |
| Modification Changes Only Please ensure that the Transporters are formally informed of the Target Implementation Date | | | |
| Approved BER version | | | |
| The change proposal shall not proceed and the BER shall lapse | | | |
| The committee votes to postpone its decision on the BER until a later meeting | | Date of later meeting | |
| The committee requires updates to the BER: | | | |
| Updates required: | | | |
| | | | |

Section 12: Change Completion Report (CCR)

Change Overview

Please include detail on the following for the chosen implementation option: modifications to UKLink, impact on operating procedures and resources of the CDSP.
Actions required of the customer prior to the commencement date

Please detail any differences between the solution that was implemented and what was defined in the BER.

Detail the revised text of the CDSP Service Description reflecting the change that has been made

Were there any revisions to the text of the UK Link Manual?

Yes (please insert the revised text of the UK Link manual below)

No

Proposed
Commencement Date

Actual
Commencement Date

Please provide an explanation of any variance

Please detail the main lessons learned from the project

Service change costs

| | | | |
|--------------------|--|------------------|--|
| Approved Costs (£) | | Actual Costs (£) | |
|--------------------|--|------------------|--|

Reasons for variance between approved and actual costs:

Please send the document to the following:

| Recipient | Email |
|---------------------------------------|-------------------------------|
| Change Management Committee Secretary | enquiries@gasgovernance.co.uk |

Section 13: Change Completion Report: Committee Outcome

| | |
|--|------------------------|
| The implementation is complete and the CCR is approved | |
| Approved CCR version | |
| The committee votes to postpone its decision on the CCR until a later meeting | Date of later meeting: |
| The committee requires further information | |
| Further information required: | |
| The committee considers that the implementation is not complete | |
| Further action(s) required: | |
| The proposed changes to the CDSP Service Description or UK Link Manual are not correct | |
| Amendments to CDSP service description / UKLink manual required: | |

Section 14: Document Template Version History

The purpose of this section is to keep a record of the changes to the overall version template and the individual sections within. It will be updated by the CDSP following approval of the template update by the Change Management Committee.

Version History:

| Version | Status | Date | Author(s) | Summary of Changes |
|----------------|---------------|-------------|------------------|--------------------------------------|
| 1.0 | Approved | | CDSP | Version Approved by Change Committee |
| | | | | |

--- END OF DOCUMENT ---

Appendix One: Glossary

| Term | Definition |
|-----------------------------|---|
| Adverse Impact | <p>A Service Change has or would have an Adverse Impact on Customers of a particular Customer Class if:</p> <p>(a) Implementing the Service Change would involve a modification of UK Link which would conflict with the provision of existing Services for which such Customer Class is a Relevant Customer Class;</p> <p>(b) the Service Change would involve the CDSP disclosing Confidential Information relating to such Customers to Customers of another Customer Class or to Third Parties;</p> <p>(c) Implementing the Service Change would conflict to a material extent with the Implementation of another Service Change (for which such Customer Class is a Relevant Customer Class) with an earlier Proposal Date and which remains Current, unless the Service Change is a Priority Service Change which (under the Priority Principles) takes priority over the other Proposed Service Change; or</p> <p>(d) Implementing the Service Change would have an Adverse Interface Impact for such Customers.</p> |
| General Service | A service provided under the DSC to Customers or Customers of a Customer Class on a uniform basis. |
| Non-Priority Service Change | A Service Change which is not a Priority Service Change |
| Priority Service Change | <p>A Modification Service Change;</p> <p>or</p> <p>A Service Change in respect of a Service which allows or facilitates compliance by a Customer or Customers with Law or with any document designated for the purposes of Section 173 of the Energy Act 2004 (including any such Law or document or change thereto which has been announced but not yet made).</p> |
| Relevant Customer class | A Customer Class is a Relevant Customer Class in relation to a Service or a Service Change where Service Charges made or to be made in respect of such Service, or the Service subject to such Service Change, are or will be payable by Customers of that Customer Class |
| Restricted Class Change | Where, in relation to a Service Change, not all Customer Classes are Relevant Customer Classes, the Service Change is a Restricted Class Change ; |
| Service Change | <p>A change to a Service provided under the DSC (not being an Additional Service), including:</p> <p>(i) the addition of a new Service or removal of an existing Service; and</p> <p>(ii) in the case of an existing Service, a change in any feature of the Service specified in the CDSP Service Description, and any related change to the CDSP Service Description</p> |
| Specific Service | A service (other than Additional Services) available under the DSC to all Customer or Customers of a Customer Class but provided to a particular Customer only upon the order of the Customer. |