UNC Workgroup Report

At what stage is this document in the process?

UNC 0641S:

Amendments to Modification 0431 - Shipper/Transporter - Meter Point Portfolio Reconciliation rules and obligations



Purpose of Modification:

This proposal seeks to amend the rules to extend the portfolio reconciliation notice period as and when an Industry reconciliation exercise is deemed necessary.

The Workgroup recommends that this modification should be:



- subject to self-governance
- issued to consultation.

The Panel will consider this Workgroup Report on 15 March 2018. The Panel will consider the recommendations and determine the appropriate next steps.



High Impact:

None



Medium Impact:

None



Low Impact:

Shippers, Suppliers, Transporters and CDSP

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7 Relevant Objectives8 Implementation9 Legal Text	Error! Bookmark not defined. 6	Andrew Margan
10 Recommendations	6	Andrew.margan@cen trica.com
Timetable		07789 577327 Transporter: Cadent
Modification timetable:		email address Chris.Warner@caden
Initial consideration by Workgroup	05 January 2018	tgas.com
Workgroup Report presented to Panel	15 February 2018	telephone 07749 983418
Draft Modification Report issued for consultation	15 March 2018	
Consultation Close-out for representations	09 April 2018	
Final Modification Report available for Panel	11 April 2018	Systems Provider: Xoserve
Modification Panel decision	19 April 2018	commercial.enquirie s@xoserve.com

1 Summary

What

Given the volume of work required to complete a reconciliation exercise, the notice period of 20 days is too short.

Why

It is believed that Shippers and their relevant Suppliers require a longer period to make appropriate arrangements to ensure there is adequate budget, resourcing and training to undertake the reconciliation exercise successfully.

How

It is suggested that the reconciliation exercise notice period is extended from 20 days to a minimum of 90 days [calendar days or business days?].

2 Governance

Justification for Self-Governance, Authority Direction or Urgency

Panel determined that this modification is unlikely to have a material effect on any party, therefore the change can proceed under the self-governance arrangements.

Modification 0641S will therefore follow self-governance procedures.

Requested Next Steps

This modification should:

- be considered a non-material change and subject to self-governance
- issued to consultation.

The Workgroup agrees with Panels view on Self-Governance and that this modification is sufficiently developed to proceed to consultation.

3 Why Change?

In 2014, during the development of Modification 0431, British Gas raised concerns with the 20 day notice period being too short. Some consider the success of the reconciliation excise will be based on individual parties' preparedness and believe 20 days notice is insufficient for parties to request additional budget, obtain approval, acquire the additional resource and for IS teams to activate and re-test the portfolio query tool.

4 Code Specific Matters

Reference Documents

This proposal builds on the proposals implemented in Modification 0431.

https://www.gasgovernance.co.uk/0431

This proposal references the new FGO arrangements that brought into effect the CDSP and amended many Code oblations – Modification 0565A.

https://www.gasgovernance.co.uk/0565

5 Solution

This proposal seeks to amend Section G 2.12.4 will be amended to give the User a minimum of 20 90 Business days notice prior to the Portfolio Date relating to which the User must provide its Supply Portfolio.

6 Impacts & Other Considerations

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

None

Consumer Impacts

Consumer Impact Assessment	
Criteria	Extent of Impact
Which Consumer groups are affected?	No direct consumer impacts identified.
What costs or benefits will pass through to them?	None identified.
When will these costs/benefits impact upon consumers?	None identified.
Are there any other Consumer Impacts?	None identified.

Cross Code Impacts

This modification seeks to introduce the Code requirement for iGT supply points to be included within the portfolio reconciliation exercise. References iGT103 - Inclusion of reference within iGT UNC to UNC TPD Section G paragraph 2.12 – 2.14 inclusive - Meter Point Portfolio Reconciliation.

It is noted that IGT Modification 103 will ensure the Codes remain Code aligned.

EU Code Impacts

None identified.

Central Systems Impacts

None identified.

Workgroup Impact Assessment

This modification would ensure that Transporters are correctly identified as the data controller for these exercises and corrects an error in UNC identifying the CDSP as the data controller when they are considered to be a data processor.

In addition, by extending the notice period from 20 Business Days to 90 Business Days, will provide sufficient time for the Shipper to mobilise the necessary resources to ensure the exercise is successfully undertaken and funded.

Rough Order of Magnitude (ROM) Assessment (Cost estimate from CDSP)

Cost estimate from CDSP where the Modification relates to a change to a CDSP Service Document

Insert text here

OR

Rough Order of Magnitude (ROM) Assessment (Workgroup assessment of costs)		
Cost estimate from CDSP	Insert text here	
Insert Subheading here	Insert text here	

7 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. c) Efficient discharge of the licensee's obligations. None

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d)	Securing of effective competition:	None
	(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.	
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.	Positive
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

This modification should further Relevant Objective f) Promotion of efficiency in the implementation and administration by ensuring all parties have sufficient notice to ensure the success of the portfolio reconciliation exercise.

8 Implementation

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

As fast track self-governance procedures are proposed, implementation could be sixteen business days after a unanimous vote in favour of implementation by the Modification Panel, subject to no Objection being raised.

9 Legal Text

Legal Text is to be provided by Cadent and is [included below/published alongside this report]. The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution.

Text Commentary

Insert text here

Text

Insert text here

10 Recommendations

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that:

• This modification is sufficiently developed to proceed to consultation.