Shipper

Low Impact:

Transporters / CDSP

# At what stage is this **UNC Workgroup Report** document in the process? UNC 0657S: 01 Modification 02 Workgroup Report Adding AQ reporting to the PARR **Draft Modification** 03 Report Schedule reporting suite Final Modification **Purpose of Modification:** This Modification adds AQ reporting to the Performance Assurance suite of reports (PARR Schedules) that were initially introduced through Modification 0520A The Workgroup recommends that this modification should be: subject to self-governance The Panel will consider this Workgroup Report on 16 August 2018. The Panel will consider the recommendations and determine the appropriate next steps. High Impact: None Medium Impact:

#### Contents Any questions? Contact: 3 **Summary** Joint Office of Gas 2 **Governance** 3 **Transporters** 3 3 Why Change? enquiries@gasgover 4 **Code Specific Matters** nance.co.uk 5 **Solution** 0121 288 2107 **Impacts & Other Considerations** 6 Proposer: **Relevant Objectives** Error! Bookmark not defined. 7 John Welch 8 **Implementation Npower Legal Text** 9 8 10 Recommendations 8 john.welch@npower. 07557 170816 Timetable Transporter: **SGN** 20 Modification timetable: Hilary.Chapman@SG Initial consideration by Workgroup 24 May 2018 N.co.uk Amended Modification considered by Workgroup 26 July 2018 Workgroup Report presented to Panel 16 August 2018 07749 983418 Draft Modification Report issued for consultation 16 August 2018 Systems Provider: **Xoserve** Consultation Close-out for representations 07 September 2018 0 Final Modification Report available for Panel 11 September 2018 Modification Panel decision 20 September 2018 UKLink@xoserve.co <u>m</u> Other: James Rigby james.rigby@npower telephone 07557 198020

# 1 Summary

#### What

Modification 0520A introduced named reporting for the Performance Assurance Committee (PAC) on a number of measures, the post Nexus content of which is due to be delivered imminently. Modification 0520A did not introduce any reporting that detailed the movement of AQs on a monthly basis by Shipper. This Modification looks to address that omission by adding named AQ reporting to the PARR (Performance Assurance Report Register) Schedule of reports.

#### Why

Given the industry wide issues experienced in relation to unidentified gas, and the potential importance of rolling AQ movements to unidentified gas levels at the allocation stage of energy balancing, it is important that the PAC are able to review AQ movements to be able to focus activity on this area as and when required.

#### How

This Modification would introduce reports showing AQ movements, with permissions for these to be seen by the PAC as a set of named, non-anonymised reports. The content will be similar, but not identical to the reports introduced through DSC change order proposal XRN4525 to be sent to the industry on an anonymous basis.

### 2 Governance

### Justification for Self-Governance, Authority Direction or Urgency

The Modification Panel determined that this Modification is suitable to follow Self-Governance procedures as these reports although un-anonymised would facilitate transparent reporting of User performance on key industry data, that is used for accurate allocation of energy and the appropriate targeting of costs. However, this is unlikely to have a material impact on competition.

Modification 0657S will therefore follow self-governance procedures.

### **Requested Next Steps**

This modification should:

- be considered a non-material change and subject to self-governance
- proceed to Consultation

Rationale for requested next steps inserted here

# 3 Why Change?

The AQ (annual quantity) is a data item of crucial importance in the settlement process. Since the introduction of the post Nexus arrangements, AQs are now calculated on a monthly basis (following the submission of meter reads in a relevant period) rather than on a typically annual basis.

# Joint Office of Gas Transporters

When the original suite of PARR reports was created through Modification 0520A, while read submission reporting was introduced, there was no reporting included that showed AQ movements or trends. This is an important omission, as movement of AQ following read submission is an important element in settlement risk, and as such it is pivotal that the PAC has regular access to data that will allow it to understand patterns and trends.

Modification 0520A also introduced a requirement that when additional PARR reports were required by the PAC, further modification would be needed to request them. As such, following the introduction of change XRN4525, which will distribute related AQ reporting to the industry in the style of the pre Nexus Mod 81 reports, the PAC ascertained that similar reporting was also required to be added to the PARR. This Modification looks to add the additional report to the suite, as the PAF arrangements intended.

It should also be noted that the proposed reporting would measure percentage of updated AQ (rather than say, sum of total energy movements) which serves to limit the information to the salient performance aspects that should be monitored.

# 4 Code Specific Matters

### **Reference Documents**

The Performance Assurance Report Register details the existing named reports to be sent to PAC on a monthly basis.

https://www.gasgovernance.co.uk/sites/default/files/ggf/PAC%20Document%201%20Performance%20Assurance%20Framework%20Report%20Register%20v1.0 0.pdf

## Knowledge/Skills

None needed.

### 5 Solution

It is proposed that the PARR is updated to add the AQ reports.

UNC Section V notes in 16.1.2 that "Any amendment to the Performance Assurance Report Registers shall be made in accordance with the Modification Rules and for such purposes the Performance Assurance Report Registers shall be deemed to be a part of the Code."

Reports to be based on the specifications below, and the PARR document will be extended to include the reports below.

Only section B of the PARR would be updated (named reports for PAC) as DSC change XRN4525 is already producing a similar set of anonymous reports for the industry that don't need to be duplicated for the industry section of the PARR.

### By Class and by MRF (where applicable)

Noming Acq								
	Percentag	e Portfolio	Calculated	in month				
AQ Band	1	2	3	4	5	6	7	8
Shipper A								
Shipper B								
Shipper C								
Industry								

	Percentag	Percentage Increased in month						
AQ Band	1	2	3	4	5	6	7	8
Shipper A								
Shipper B								
Shipper C								
Industry								

	Percentage Decreased in month							
AQ Band	1	2	3	4	5	6	7	8
Shipper A								
Shipper B								
Shipper C								
Industry								

	Percentag	e of portfol	io with AQ	calculation	1 month, 4	months,	12 months,	, 12 months p
Month	1	2	3	4	5	6	7	8 etc.
Shipper A								
Shipper B								
Shipper C								
Industry								

	Total Pe	Fotal Percentage Portfolio Calculated by Month (12 mths rolling)						
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
Shipper A								
Shipper B								
Shipper C								
Industry								

	Percenta	age Increas						
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
Shipper A								
Shipper B								
Shipper C								
Industry								

	Percentag	e Decreas						
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
Shipper A								
Shipper B								
Shipper C								
Industry								

	Failure to calulate by rejection codes							
Rejection Code	1	2	3	4	5	6	7	8
Shipper A								
Shipper B								
Shipper C								
Industry								

# 6 Impacts & Other Considerations

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

No impacts identified.

# **Consumer Impacts**

No direct consumer impacts identified.

## **Consumer Impact Assessment** (Workgroup assessment of proposer initial view or subsequent information) Criteria **Extent of Impact** Which Consumer groups are affected? Please consider each group and delete if not applicable. **Domestic Consumers** Small non-domestic Consumers Large non-domestic Consumers Very Large Consumers What costs or benefits will pass through to them? Please explain what costs will ultimately flow through to each Consumer group. If no costs pass through to Consumers, please explain why. Use the General Market Assumptions approved by Panel to express as 'cost per consumer'. Insert text here When will these costs/benefits impact upon Unless this is 'immediately on implementation', consumers? please explain any deferred impact. Insert text here

Are there any other Consumer Impacts?	Prompts:
	Are there any impacts on switching?
	Is the provision of information affected?
	Are Product Classes affected?
	Insert text here

### **Cross Code Impacts**

There might be a requirement to confirm that permission has been granted to provide the information in the proposed report.

## **EU Code Impacts**

None identified.

### **Central Systems Impacts**

There should be a limited impact on Central System as PARR Schedule reports are already being provided.

### **Workgroup Impact Assessment**

The Workgroup noted the questions raised by Panel and have provided the following response:

Should the reports be anonymised or un-anonymised.

The Workgroup understands the concerns that the provision of un-anonymised data should be controlled due to the potential risks involved with the inadvertent circulation of commercially sensitive information. However, the provision of un-anonymised AQ data to PAC should have been included in the reporting established by Modification 0520A and this modification is correcting an oversight.

As the movement of AQs following read submission is an important element in settlement risk, it is important that PAC has regular access to data that will allow it to understand patterns and trends, while gaining insight as to whether specific organisations would benefit from education/support without the need to resort to indiscriminate incentive mechanisms.

Consider EBCC Credit Rules for managing the framework and reporting requirements.

The Workgroup understands that the Energy Balancing framework operated by the EBCC, aims to correct positions of individual organisations that might be in breach of the rules and although the reporting is usually anonymised, it is specific to an individual organisations performance and does not lead to action being taken against other organisations. Whereas the PAC is using the information to consider trends in performance for the wider market, while also trying to understand why an individual organisations performs in a certain way and if the performance reported is a one off or on a regular basis.

## Rough Order of Magnitude (ROM) Assessment

ROM Request was submitted to the CDSP on 20 July 2018.

#### 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	None						
(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						
d) Securing of effective competition:	Positive						
(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	None						
secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers.							
f) Promotion of efficiency in the implementation and administration of the	Positive						
Code.							
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of	None						
Energy Regulators.							

This Proposal will have a positive impact on Relevant Objective d) securing of effective competition, as it will facilitate greater transparency of reporting on key metrics related to settlement processes which underpin the accurate allocation of costs.

The Proposal could also have a positive impact on Relevant Objective f), the promotion of efficiency in the implementation and administration of the Code by avoiding the need for repeated Modifications in this area as and when reporting is required.

# 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.

# 9 Legal Text

Legal Text has been provided by [name] 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.

## **Suggested Text Commentary**

This Modification should only require an update to the PARR document.

## **Suggested Text**

Existing section V 16.1.2 [should this be 16.5.2] text should already allow amendment to the PARR by Modification:

"Any amendment to the Performance Assurance Report Registers shall be made in accordance with the Modification Rules and for such purposes the Performance Assurance Report Registers shall be deemed to be a part of the Code."

## 10 Recommendations

## Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that:

This self-governance modification should proceed to consultation.