

Representation - Draft Modification Report UNC 0654

Mandating the provision of NDM sample data

Responses invited by: **5pm on 07 September 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Lesley Bowen
Organisation:	EDF Energy
Date of Representation:	07 September 2018
Support or oppose implementation?	Support/Oppose/Qualified Support/Comments* <i>delete as appropriate</i>
Relevant Objective:	d) Positive/Negative/None* <i>delete as appropriate</i> f) Positive/Negative/None* <i>delete as appropriate</i>

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

We support mandating the provision of Non-Daily Meter (NDM) sample data, as this will aid the development of more accurate allocation profiles and End User Categories (EUCs). This modification will also have a positive impact on the current level of Unidentified Gas (UIG) across the industry.

Self-Governance Statement: *Please provide your views on the self-governance statement. In particular do you consider the Modification is suitable for Self-Governance?*

The modification is a request for data, therefore EDF Energy agrees that this modification is suitable for self-governance.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

We would expect a minimum implementation period of three months. This would allow time for the development of the required reports in the specified format. However, we do have concerns over use of encrypted emails for the provision of this data. Therefore, our preference would be to delay the implementation until an IX flow is available to securely pass the data required.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

We have assessed the cost for the implementation of this modification and we can provide this information on a confidential basis directly to the Joint Office.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Section 1.6.13 of the legal text states ‘each NDM Sampling Shipper User shall make its submissions to the CDSP in accordance with (a) above, unless it notifies the CDSP that it elects to make its submission in accordance with (b) or (c).’ Due to this drafting the onus is on suppliers to ensure they notify CDSP if they are not providing the sample data monthly, by the fifth Business Day of each month and are choosing either quarterly or biannually. Given the lack of data currently provided to CDSP by suppliers we propose that the legal text is changed to mandate the submission of the data, where possible, bi-annually. Where suppliers are able to provide more frequent data this can still be submitted either on an optional quarterly or monthly basis by agreement with CDSP.

The legal text should also include an allowance if a supplier cannot collect a small proportion of the data required for technical reasons. By requesting that the data has to be for every day in the period there is a possibility this may then exclude the submission of data which would still be beneficial to the CDSP. We consider that, if the data contains small gaps, but would remain beneficial, this should still be provided to CDSP in the short term.

The timelines within the legal text, requesting that data be submitted by the fifth business day, will be problematic if this falls on a weekend or bank holiday. Where this is the case this would require suppliers to submit the data in advance of this date. This could have an impact on business as usual processes, for example the processing of reads, therefore, the date in the current legal text should be extended.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

The current approach for text fields in CSV files is that they are enclosed with “double quotes”, whereas this modification stipulates that text fields should not be enclosed with “double quotes”. This inconsistent approach will have a further cost impact if the information is changed at a later date to be sent via IX flow, as an additional change would be required to add “double quotes”. Therefore, we recommend the double quotes are included in the initial proposed solution. We are aware of other industry processes that have caused parties problems when not using this standard approach for text files within CSV files.

Please provide below any additional analysis or information to support your representation

We do not agree that the files should be sent by a password-encrypted email due to the sensitive nature of the information, which includes daily read information for a specific Meter Point Reference Number (MPRN). Our preference is to directly implement an IX file process for this modification, rather than a short-term solution of providing the information by a password-encrypted email. We cannot see why this would take any

significant additional time for CDSP to build and would provide a more reliable mechanism that better safeguards customers data.

The proposed approach for Spring Modelling could be simplified by requesting suppliers provide 13 months of data, which could also be replicated for the Autumn Modelling, allowing a consistent approach across the two scheduled activities. The CDSP could then extract the data required rather than a change in approach for suppliers during the Easter holiday period.

Clarification is required for suppliers where meters are marked as faulty. There needs to be a consistent approach taken by suppliers if a meter which has been classified as faulty for a specific period should be excluded. For example, would a meter which has been identified as faulty for a week, but that was subsequently proven not to be the case and we have reads for the remainder of the period, remain acceptable for submission, or should it be excluded? Our main concern is that asking for perfect data could significantly impact on a supplier's ability to provide sufficient data.