












| UNC Modification | | At what stage is this document in the process? |
|---|---|--|
| <h1>UNC 0691S:</h1> <h2>CDSP to convert Class 2, 3 or 4 meter points to Class 1 when G1.6.15 criteria are met</h2> | | <div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #00a651; color: white; padding: 5px; display: flex; align-items: center; justify-content: center;"> 01 Modification </div> <div style="border: 1px solid #00a651; padding: 5px; display: flex; align-items: center; justify-content: center;"> 02 Workgroup Report </div> <div style="border: 1px solid #00a651; padding: 5px; display: flex; align-items: center; justify-content: center;"> 03 Draft Modification Report </div> <div style="border: 1px solid #00a651; padding: 5px; display: flex; align-items: center; justify-content: center;"> 04 Final Modification Report </div> </div> |
| <p>Purpose of Modification:</p> <p>This Modification proposes that where the requirement for a Class 2, 3 or 4 meter point to become Class 1 (number of calculations and number of months) has been met, and the Shipper has not taken steps to convert the site to Class 1 within a 28 Supply Point System Business Day grace period, that the CDSP would take steps to convert the meter point to Class 1.</p> <p>The Modification also proposes a new Performance Assurance report of sites where the CDSP has taken action, over the previous 12 months.</p> | | |
|  | <p>The Proposer recommends that this Modification should be:</p> <ul style="list-style-type: none"> subject to self-governance assessed by a Workgroup <p>This Modification will be presented by the Proposer to the Panel on 19 December 2019. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p> | |
|  | <p>High Impact: None</p> | |
|  | <p>Medium Impact: Shippers, CDSP, DM Service Providers</p> | |
|  | <p>Low Impact: Gas Transporters, affected End Consumers</p> | |

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| Timetable | | | Hilary.Chapman@sgn.co.uk |
| The Proposer recommends the following timetable: | | | |
| Initial consideration by Workgroup | 29 April 2019 | |  07749 983418 |
| Workgroup Report presented to Panel | 19 December 2019 | | Systems Provider: Xoserve |
| Draft Modification Report issued for consultation | 19 December 2019 | |  |
| Consultation Close-out for representations | 23 January 2020 | | UKLink@xoserve.com |
| Final Modification Report available for Panel | 30 January 2020 | | |
| Modification Panel decision | 20 February 2020 | | |

1 Summary

What

This Modification proposes that the CDSP is given an obligation to convert Class 2, 3 and 4 meter points to Class 1, where they have met the Class 1 qualifying criteria but have not been actioned by the Shipper within a set time frame. The intention is to limit the time period when very large sites are subject to NDM Demand Estimation, as opposed to being Daily Metered.

For the avoidance of doubt this proposal envisages a similar obligation for Class 2 meter points which have met the Class 1 criteria, even though they are already daily metered. This would ensure that very large sites are subject to Class 1 read submission timings and central service provision.

Why

The Unidentified Gas Task Force (as established by UNC Modification 0658) has determined that very large sites which are above the Class 1 threshold but remain as either Class 3 or Class 4 can contribute to daily UIG volatility. This is because their daily gas allocation will be determined using the Non-Daily Metered (NDM) Demand Estimation Algorithm rather than using their actual metered consumption.

Although any differences between allocated and actual consumption will be corrected by meter point reconciliation, these sites may have an irregular usage pattern and the NDM Algorithm may not be a good estimate of the actual consumption, with any difference being a component of UIG each day.

Based on the findings of the UIG Task Force, as at December 2018 just 12 sites were contributing 0.85% of national LDZ throughput to annualised UIG and up to 0.3% of national LDZ throughput to daily UIG volatility.

Measures to shorten the period between qualification and conversion to Class 1 would help to reduce daily UIG volatility. Including existing Class 2 sites within this proposal would ensure that very large sites are subject to Class 1 meter read submission timings. This should help to reduce the volatility of UIG between D+1 and D+5 and could also improve meter read submission levels through the use of a central service.

How

This Modification proposes that after the qualifying period for the requirement for a meter point to become Class 1 is met, where the meter point is currently Class 2, 3 or 4, and where there is no evidence that the Shipper has taken all reasonable steps to convert the meter point to Class 1 within a grace period of 1 month that the CDSP would have an obligation to convert the meter point to Class 1 and advise the relevant Shipper of the changes.

This would include arranging for the installation of daily reading equipment, where this is not already in situ.

This Modification also seeks to introduce an additional report to Performance Assurance Committee (and a corresponding anonymised report) in the Performance Assurance Report Register of the count and aggregate AQ of meter points where the CDSP is in the process or has completed work to convert to Class 1, over the previous 12 month period.

Note: a separate UNC Modification proposal (UNC 0690) will consider possible reduction of the qualifying period for Class 1, so that is out of the scope of this proposal.

2 Governance

Justification for Self-Governance

This Modification is recommended for self-governance procedures, on the basis that it is a minor change to industry governance and seeks to improve take-up of Class 1, and thereby reduce UIG volatility.

This Modification does not seek to prescribe any change to end consumer billing arrangements, which are at the discretion of the Supplier. Meter points with an AQ above 732,000 kWh should already have a daily reading capability.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to self-governance
- be assessed by a Workgroup

3 Why Change?

The current arrangements do not provide sufficient incentive for meter points to be moved to a Class 1 service, once the qualifying criteria are met. If there is a delay, Class 3 and 4 meter points will be subject to NDM Allocation, based on a standard national profile, rather than being allocated energy based on its actual daily usage. Class 2 meter points would have until the end of D+1 to submit a meter reading and would not be subject to the centralised service provision for daily meter reads (pending any recommendations from Review Proposal 0694 – CDSP provision of Class 1 Read service).

Based on the findings of the UIG Task Force, as at December 2018 just 12 sites were contributing 0.85% of national LDZ throughput to annualised UIG and up to 0.3% of national LDZ throughput to daily UIG volatility.

4 Code Specific Matters

Reference Documents

UIG Task Force findings:

<https://www.xoserve.com/media/1492/321-inaccurate-or-out-of-date-aqs-non-daily-metered-euc09-sites.pdf>

Knowledge/Skills

A knowledge of the daily reading process would be useful.

5 Solution

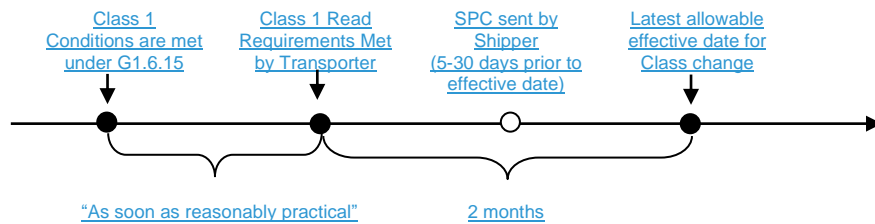


Figure 1: Existing timeline for change to Class 1

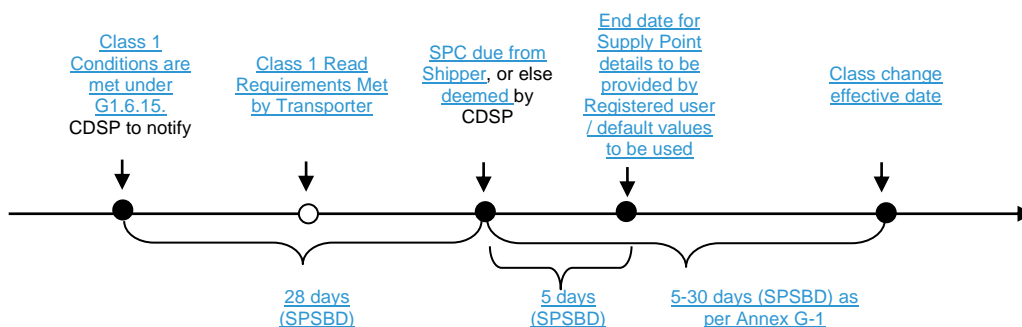


Figure 2: Proposed timeline for change to Class 1

Obligations on CDSP

This Modification proposes [a new obligation on the CDSP to convert sites with an AQ larger than 58.6m kWh to Class 1 if the Shipper does not do this](#). The proposal also seeks to tighten the existing timeframes involved.

[In summary, that should where](#) a Class 2, 3 or 4 site meet the qualifying conditions to become Class 1 [as outlined in G1.5 and 1.6](#) through reason of an AQ exceeding the Class 1 threshold of 58.6m kWh subject to [G1.6.15](#), and where the Shipper has not taken steps ([ie.eg.](#) submitted a [Supply Point Re-confirmation to Class 1](#)) to convert the meter point to Class 1 within a grace period of 28 Supply Point System Business Days [since meeting G1.6.15](#), then the CDSP would have an obligation to [progress the convert the meter point conversion](#) to Class 1, [and advise the relevant Shipper of the changes](#).

[In more detail, the proposed sequence of events should be:](#)

1. [The CDSP should notify both the shipper and relevant transporter immediately upon a site meeting the Class 1 qualifying conditions under G1.6.15.](#)
2. [The Shipper should have a reduced timeframe \(compared to the existing obligation\) to send a Supply Point Reconfirmation to transfer the site to Class 1. The new deadline should be 28 day \(SPSBD\) from the date of the conditions under G1.6.15 being met.](#)
3. [The CDSP should notify the Shipper and relevant transporter immediately upon expiry of the 28 day \(SPSBD\) grace period, should a Supply Point Reconfirmation not be received from the Shipper. The notification by the CDSP should also include a request for relevant details \(to be described below\), as well as the effective date that the CDSP initiated move to Class 1 will be effective from. The CDSP will have the discretion to apply an effective date anywhere from 5-30 days from the issue of the Supply Point Reconfirmation, as per Annex G-1. At this point the CDSP should also ~~This would include~~](#)

~~arranging-arrange~~ for the DM Service Provider to include the meter point in their daily reading files to the CDSP. ~~Existing obligations apply to the -and-arranging for the~~ Transporter ~~regarding the satisfaction of the to-satisfy the~~ Class 1 Meter Read Requirements.

~~Obligations on Shippers~~

Default values for transfer

Cooperation will be required from the relevant shipper in terms of arranging site access for the installation of any required metering equipment, and in the provision of necessary site information to process the Supply Point Amendment (Supply Point Capacity, ~~-and~~ Supply Point Offtake Rate, Meter Reading). Where ~~the site this~~ information is not provided by the Shipper within 5 Supply Point System Business Days the following business rules for default values should apply:

- Where the site is currently Product Class 2 and unless instructed otherwise by the Shipper within 5 Supply Point System Business Days of the end of the grace period the CDSP should use the existing Supply Point Capacity and Supply Point Offtake Rate values for the site.
- For sites currently in Product Class 3 or 4 the Shipper should supply a Supply Point Capacity within 5 Supply Point System Business Days of the end of the grace period. If this is not supplied the NDM Supply Point Capacity should be used (as referenced in Section B4.3). If the Shipper does not provide a Supply Point Offtake Rate within 5 Supply Point System Business Days of the end of the grace period a default value of one twelfth of the Supply Point Capacity should be used.
- Should the Shipper not provide a meter reading within 5 days (SPSBD) then a read should be estimated by the CDSP consistent with M5.4. (i.e. “the Annual Quantity for the Supply Meter Point, divided by 365, and converted to volume by dividing by the applicable calorific value”).

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

This Modification does not seek to prescribe any change to end consumer billing arrangements, which are at the discretion of the Supplier. Meter points with an AQ above 732,000 kWh should already have a daily reading capability.

Cross Code Impacts

A similar Modification may be required to IGT UNC. For the avoidance of doubt the intention is for this proposal to also apply to Supply Points on IGT Networks. It is not anticipated a SPAA change would be required but we welcome feedback from the Suppliers or the CACoP.

EU Code Impacts

None

Central Systems Impacts

CDSP systems will need to be changed to identify sites which have met or are approaching the qualifying threshold and to produce the additional reports and notifications to Shippers. The CDSP will need to establish processes to undertake the conversion to Class 1, including liaising with providers of daily reading equipment, where that is not already fitted at the meter point.

The CDSP may need to put commercial contracts in place for the procurement of daily reading services.

A change to the Data Services Contract will also be required, as well as a charging methodology. It is envisaged that the relevant Shipper would bear any specific CDSP costs of converting the meter point to Class 1, including any administration costs.

An outline of the proposed service line change to the Data Services Contract is below. The relevant Shipper should bear any specific CDSP costs of converting the meter point to Class 1, including any administration costs.

| | |
|---|---|
| Part E Specific Services - Service Area 22 | |
| Reference | SS SA22 <i>tbc</i> |
| Service Requirement Description | Conversion of Class 2, 3 or 4 Supply Meter Point to Class 1 when the G1.6.15 criteria have been met and the Shipper has not actioned the change with the allowed grace period. |
| Service Requirement Trigger | More than 28 Supply Point System Business Days has elapsed since the effective date of the AQ calculation which caused the G1.6.15 criteria to be met, and the Shipper has not initiated a Class Change |
| Service Requirement Output | Supply Meter Point has been changed to Class 1 and DMSP is now submitting daily readings. Necessary data items e.g. DMSOQ, DMSHQ have been provided to UKLink in line with Business Rules. |
| Time for delivery of service requirement | As soon as reasonably practicable |
| How service requirement delivered | Update to CDSP records |
| Corresponding UNC requirement | TPD Section <i>tbc</i> |
| Other corresponding requirement | |
| Service volume constraints (none unless stated) | |
| Performance standard | |
| KPI category (1-4) | |
| Corresponding obligation needed for delivery (Customer Responsibilities) | |
| Charging Measure | Per completed Class Change |
| Charging period | As and when required |
| Change references to Service Description Table (note this does not form part of the Service Description Table) | Source: Mod 0691 |
| | Version: |

This Modification also seeks to introduce an additional report to Performance Assurance Committee (and a corresponding anonymised report) in the Performance Assurance Report Register of the count and aggregate AQ of meter points where the CDSP is in the process or has completed work to convert to Class 1, over the

previous 12 month period. Note that reporting from an earlier XRN (4867) is already in place to provide visibility on sites due to trigger the Class conditions – the additional data items required are shown below.

| Detail Report (Confidential) – (Italicised items as per XRN 4867) |
|--|
| <ul style="list-style-type: none"> • <i>MPRN</i> • <i>Shipper Short Code</i> • <i>Network Operator</i> • <i>End User Category</i> • <i>Confirmation status</i> • <i>Meter status</i> • <i>Meter point status</i> • <i>Site Type</i> • <i>Rolling AQ effective date</i> • <i>Rolling AQ</i> • <i>Meter Link Code</i> • <i>LDZ</i> • <i>Meter read frequency</i> • <i>Previous Rolling AQ</i> • <i>Formula Year AQ</i> • <i>Rolling SOQ volume</i> • (additional) DM Transfer Status (Approaching criteria / Criteria met / Transfer in progress / Transfer complete) • (additional) Date AQ first approached DM threshold • (additional) Date UNC criteria fully met • (additional) Date of DM equipment installation • (additional) Date transferred to PC1 |

Related Modifications

Pending any recommendations from Review Proposal 0694 – CDSP provision of Class 1 Read service, the CDSP may also need to liaise with DM Service Providers to set up the meter point as Class 1.

For the avoidance of doubt, this Modification does not propose to change the qualifying rules in G1.5 and G1.6 as far as they relate to the Class 1 requirement, as that will be subject to a separate Modification proposal (Modification UNC 0690).

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. | Positive |
| b) Coordinated, efficient and economic operation of <ul style="list-style-type: none"> (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters. | Positive |
| c) Efficient discharge of the licensee's obligations. | None |
| d) Securing of effective competition: | Positive |

| | |
|--|------|
| <p>(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.</p> | |
| <p>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.</p> | None |
| <p>f) Promotion of efficiency in the implementation and administration of the Code.</p> | None |
| <p>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.</p> | None |

The main impacted objective is d). The Use of Class 1 instead of Classes 2, 3 and 4 for the largest sites in the market would lead to greater accuracy of daily allocation, less UIG volatility and lower levels of subsequent meter point reconciliation.

The Modification also has positive benefits for a) and b) as ensuring daily visibility of consumption from the largest loads on the system would improve the operation and coordination of the pipe-line systems and allow more informed capacity planning.

8 Implementation

After a Modification Panel decision to implement, subject to no Appeal being raised, the CDSP would need to confirm the delivery timescales for the changes to processes and systems. A Change Proposal will also be required to determine the cost of changing the CDSP's systems and processes, including any reports for PAC.

9 Legal Text

Text Commentary

Legal text to be provided.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that self-governance procedures should apply
- Refer this proposal to a Workgroup for assessment.