UNC Workgroup Report At what stage is this document in the process?			
Am	NC 0713: endments to TPD V3.1.7 ependent Assessment table	01 Modification 02 Workgroup Report 03 Draft Modification Report 04 Final Modification	
	se of Modification: This Modification makes changes to a UNC m changes to the way Graydon determines credit ratings.	napping table to	
	 The Workgroup recommends that this modification should be subject to self-governance The Panel will consider this Workgroup Report on [20 February, 2020]. The Panel will consider the recommendations and determine the appropriate next steps. High Impact: Medium Impact: 		Deleted: 16 April
0	Low Impact: Shippers that use Graydon's independent assessment for transp Transporters	portation credit,	

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		<u></u>	wutilities.co.uk		
Timetable			029 2027 8552		
TIMELADIE			or 07812 973337	-	
Modification Timetable			Transporter: Wales & West		
Initial consideration by Workgroup	23 January 2020		Utilities		
Workgroup Report presented to Panel	16 April 2020		0		
Draft Modification Report issued for consultation	16 April 2020		Richard.Pomroy@w		
Consultation Close-out for representations	01 May 2020		wutilities.co.uk		
Final Modification Report available for Panel	12 May 2020		029 2027 8552		
Modification Panel decision	21 May 2020		or 07812 973337		
			Systems Provider:		
			Xoserve		
			0		
			UKLink@xoserve.c		
			om Other:	-	
			n/a		

1 Summary

What

The table in UNC Transportation Principal Document (TPD) V 3.1.7 (which shows how to calculate a User's Unsecured Credit Limit) needs to be updated to reflect changes in the credit ratings issued by Graydon.

UNC TPD V can be found here:

Why

If this change is not made, then new Shippers will not be able to use Graydon for an independent assessment for obtaining credit. Existing Shippers will also not be able to use Graydon if their circumstances change.

How

The solution proposed populates the table with the new credit ratings now issued by Graydon.

2 Governance

Justification for Self-Governance

Panel determined the Modification:

(i) __is unlikely to have a material effect on:

- competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes; and
- (ii) is unlikely to discriminate between different classes of parties to the uniform network code/relevant gas transporters, gas shippers or DN operators.

Although this Modification will have a positive effect on competition by making the Graydon rating fit for useagain, the changes proposed will not affect those Shippers who currently use Graydon so the effect is not material. It is unlikely to discriminate between Shippers because it reinstates Graydon as a useable option for independent assessment.

Modification 0713 will therefore follow self-governance procedures.

Following discussion, firstly as a pre-modification, and subsequently in a proposal specific workgroup, participants present agree that the proposal should be subject to self-governance.

Requested Next Steps

This modification should:

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

The suggested consultation period could be reduced to 10 Business Days from the standard 15 Business Days because this Modification is not expected to impact any Shippers that use Graydon's ratings. Should any issues be raised at workgroup Panel can consider consulting for the standard 15 Business Days.

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3 Why Change?

Graydon have changed their methodology for producing credit ratings and have introduced a new table of ratings. These ratings are 'alpha' ratings as opposed to the previous 'alpha numeric' ratings. This means that the Uniform Network Code needs to be amended to replace the old ratings with the new ratings.

The Proposer is also making a small minor change to the wording on Dunn and Bradstreet scoring for the lower ratings to improve clarity. This change is being made because the current wording referring to a rating being below a certain letter does not really make sense in the context of an alpha-numeric system.

This will impact the small number of Shippers that use Graydon for independent assessment. If this change is not made the option of using Graydon for independent assessment will not be available and will limit the options for Shippers to two agencies.

4 Code Specific Matters

Reference Documents,

UNC Transportation Principal Document, Section V

Knowledge/Skills

Familiarity with Code credit arrangements.

5 Solution

Amend text in TPD V 3.1.7 as shown below.

Independent Assessment Score	Equivalent of the Independent Assessment Score to credit scores provided by the independent credit rating agencies for Independent Assessments			% of Transporter's Maximum Unsecured Credit Limit	
	Dunn & Bradstreet/ N2 Check Comprehensive Report	Experian Bronze, Silver or Gold Report	Graydons Level 1, Level 2 or Level 3 Report		
10	5A1	95-100	1AAAA	20	
9	5A2/4A1	90-94	1B/2AAA	19	
8	5A3/4A2/3A1	80-89	1C/2B/3AA	18	
7	4A3/3A2/2A1	70-79	2C/3B/4ABBB	17	

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6	3A3/2A2/1A1	60-69	3C/4B/5ABB	16
5	2A3/1A2/A1	50-59	4 C/5B/6A B	15
4	1A3/A2/B1	40-49	5C/6B/7ACCC	13 ^{1/3}
3	A3/B2/C1	30-39	6C/7B/8ACC	10
2	B3/C2/D1	20-29	8BC	6 ^{2/3}
1	C3/D2/E1	10-19	8C Not in use	31/3
0	Below E1E2 to Z inclusive	Below 10	Below 8CD to Z inclusive	0

6 Impacts & Other Considerations

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

No

Consumer Impacts

The changes should not affect any Shipper's credit and hence there should be no consumer impacts.

Cross Code Impacts

Not directly, although the IGT UNC and DCUSA may want to consider a similar change if Graydon is used for independent assessment.

EU Code Impacts

None

Central Systems Impacts

No impact.

Workgroup Impact Assessment [CONFIRM]

In order to produce the amended table, the proposer has taken new alpha-only credit rating scores, published by Graydon UK Ltd, [where – reference please], and matched them, as closely as is reasonably practicable, to the values used in the discontinued alpha-numeric scoring system. The matched values have now been inserted into the table and, going forward, would be used to determine the level of Unsecured Credit available from a transporter.

The workgroup has reviewed the output from the matching process and are confident that work undertaken to convert from the old scoring system to the new scoring system has been carried out diligently and broadly agree that the corresponding credit rating scores proposed for inclusion in the Gaydon column are fair & reasonable.

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Rough Order of Magnitude (ROM) Assessment

This activity is managed by each transporters' credit risk management department and, as such, has no impact on central system. The CDSP has would not be involved in implementation and, consequently, no ROM is required.

7 Relevant Objectives

Im	Impact of the modification on the Relevant Objectives:				
Re	levant 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 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			

[CONFIRM]

This Modification furthers the following relevant objectives:

(f), by replacing Graydon's out of date scoring system with the new system, the approved range of credit scoring providers recognised by UNC will contain credit scoring systems consistent with those provided by the listed companies. Consistency across the market and the UNC aids administration.

(d), by restoring the third option for independent assessment of credit ratings for Shippers, thus providing the maximum credit availability advantages to all users, thereby enhancing the users opportunities to compete

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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.

Legal Text 9

Text Commentary

The table is updated for the new Graydon ratings and a minor wording change for Dunn and Bradstreet.

Text

Replace the table in TPD V 3.1.7 with the table below

Independent Assessment Score	Equivalent of the Independent Assessment Score to credit scores provided by the independent credit rating agencies for Independent Assessments			% of Transporter's Maximum Unsecured Credit Limit		
	Dunn & Bradstreet/ N2 Check Comprehensive Report	Experian Bronze, Silver or Gold Report	Graydons Level 1, Level 2 or Level 3 Report			
10	5A1	95-100	AAA	20		
9	5A2/4A1	90-94	AA	19		
8	5A3/4A2/3A1	80-89	А	18		
7	4A3/3A2/2A1	70-79	BBB	17		
6	3A3/2A2/1A1	60-69	BB	16		
5	2A3/1A2/A1	50-59	В	15		
4	1A3/A2/B1	40-49	CCC	13 ^{1/3}		
3	A3/B2/C1	30-39	СС	10		
2	B3/C2/D1	20-29	С	6 ^{2/3}		
1	C3/D2/E1	10-19	Not in use	3 ^{1/3}		
0	E2 to Z inclusive	Below 10	D to Z inclusive	0		

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10 Recommendations

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that this self-governance modification should proceed to consultation.

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