## **UNC Modification**

# UNC 0801:

# Removal of capacity and balancing services from the role of CDSP

At what stage is this document in the process?



Modification



Workgroup Repo



3 Draft Modificati Report



Final Modification Report

## **Purpose of Modification:**

This Modification proposes to remove certain services, relating to capacity and balancing, from the role of the Central Data Service Provider (CDSP) within UNC. This will allow National Grid to deliver their UNC obligations through other means.

#### **Next Steps:**

The Proposer recommends that this Modification should be:

- considered a material change and not subject to Self-Governance
- assessed by a Workgroup

This Modification will be presented by the Proposer to the Panel on 17 February 2022. The Panel will consider the Proposer's recommendation and determine the appropriate route.

## **Impacted Parties:**

High: National Grid, CDSP

Low: Shippers, Distribution Network Operators.

None: IGTs

Impacted Codes: UNC.

UNC 0801 Page 1 of 9
Modification

Version 42.0 09 February 2022

9 Legal Text10 Recommendations

#### Contents **Summary** 1 2 Governance 3 Why Change? **Code Specific Matters** 5 **Solution Impacts & Other Considerations** 6 **Relevant Objectives** 7 Implementation 8

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#### Timetable Modification timetable: Pre-Modification Discussed 03 February 2022 Date Modification Raised 04 February 2022 17 February 2022 New Modification to be considered by Panel First Workgroup Meeting 03 March 2022 11 May 2022 Workgroup Report to be presented to Panel 19 May 2022 Draft Modification Report issued for consultation Consultation Close-out for representations 13 June 2022 14 June 2022 Final Modification Report available for Panel Modification Panel decision 16 June 2022 (at short notice)



#### 1 Summary

#### What

Provisions relating to the CDSP and CDSP services are set out within the UNC in General Terms Section D. Gas Transporters must contract with the CDSP to deliver any services or functions that are identified as CDSP services by the UNC. The scope of this Modification proposal would remove certain services (relating to capacity and balancing) from being defined as CDSP services.

#### Why

National Grid is considering replacing the Gemini system to modernise the service offered and realise efficiency savings. If National Grid were to have more flexibility in being able to procure capacity and balancing services from the market, then this could result in cost savings for industry and consumers in the delivery and maintenance of any Gemini replacement system (aka Apollo). Any new system would also be intended to result in improved customer service/features addressing customer pain points, as well as a system that is more adaptive to accommodating future regulatory changes.

#### How

CDSP services relating to capacity and balancing shall be amended so that they are no longer a UNC obligation on the CDSP to deliver. Amendments will be made accordingly to GT Section D and TPD as required (including sections B, E, F and S, and any other relevant sections). A separate change proposal will be raised to cover changes to DSC documents (including UK Link manual and DSC services).

## 2 Governance

#### **Justification for Authority Direction**

The change will result in a reapportionment of CDSP costs and changes to service lines. The costs may be considered to be material and worthy of Authority consideration. Gemini systems change will also be removed from DSC Change services and Change Management procedures.

## **Requested Next Steps**

This Modification should:

- be considered a material change and not subject to Self-Governance.
- be assessed by a Workgroup.

## 3 Why Change?

Capacity and balancing services are predominantly delivered via the Gemini system. This is an aging system which National Grid would like considering to replacing in order to deliver a modern responsive and adaptive system to better meet the needs of our customers now and in the future, and to realise efficiency savings. Customer needs have been identified via customer feedback and workshops, and any new system will be designed to eliminate, or otherwise improve upon, the pain points identified.

The purpose of this proposal is to remove <u>certain UNC</u> obligations relating to capacity and balancing services from the CDSP. The focus is particularly on those capacity and balancing services currently delivered by the

<u>Gemini system.</u> This allows National Grid NTS to have flexibility in procuring the delivery of those services from the market, in order to maximise benefits from the replacement programme for stakeholders.

Anticipated benefits from a replacement system are summarised as follows:

- Reduced maintenance costs
- Reduced cost and increase speed of system functionality change
- Increased application availability 24 x 7 (no requirement to take systems down for weekend maintenance functions)
  - Note major releases may still require some scheduled down time TBC
- Abstraction layer enabling mixed communication channels simultaneous support for both legacy
  channels (I'X) and new channels (API); this will enable new entrants to the market / change whilst not
  requiring current participants to make immediate change to their systems
- Multi-device and mobile enablement ipad/phone
- Responsive screen design support for different browsers
- Integration into GT&M's Data & Insights Platform, enabling consolidated reporting aligned with the Energy Data Taskforce recommendations
- Enabling faster and improved change flexibility
- Federated identity management enabling organisations to manage users rather than requiring requests helpdesk to enable

## 4 Code Specific Matters

#### **Reference Documents**

UNC General Terms Section D, and Transportation Principal Document

**DSC/CDSP Documents** 

## Knowledge/Skills

n/a

## 5 Solution

#### **UNC**

Service obligations on the CDSP to provide the following Agency services shall be removedend dated:

- Establishing and operating UK Link Gemini (GT Section D)
- Capacity Functionality (TPD Sections B) relating to:
  - Transportation Charges (NTS only).
  - Overrun Charges (NTS only)
  - Maintaining a record of NTS capacity & Invoicing (TPD Sections B, S)

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- Energy Balancing Functionality (TPD Sections F) relating to:
  - Energy Balancing Charges (other than Reconciliation Clearing) & Invoicing (TPD Sections E, F, S)
- NTS Invoicing currently performed by Gemini, including the following invoice types (TPD Section S):
  - NTS Entry Capacity
  - NTS Exit Capacity
  - Balancing
  - NTS Entry Commodity

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#### DSC

Services relating to Gemini are also contained within the DSC. DSC documents will be updated accordingly by a change proposal to the relevant DSC Committee to remove the associated Gemini services. This will enable the appropriate DSC Committee(s) to give due consideration to the necessary changes. Changes to the DSC pursuant to the Change Proposal referenced shall be consistent with this UNC modification. The changes shall also be dependent upon approval of this UNC modification. This includes:

- Gemini Change Delivery
- Gemini Reporting
- Gemini Training
- Gemini Code Contingency Exercise
- Gemini Service Desk

The changes to Gemini services will be reflected accordingly in:

- The CDSP Service Document:
  - paragraph 3.2.3 which lists the Service Areas. The main affected areas are Gemini Services
     and Invoicing. Other service areas may also be impacted upon e.g. Customer Contacts.
  - Service Description Table (annex 1).

Noting that for any Service Areas that are shared Service Areas, then they shall continue to exist as they are for other customers of the CDSP.

- the Budget & Charging Methodology:
  - Paragraph 3.1.1 which is the Charge Base Apportionment Table. The percentages for the affected Service Areas will need to be adjusted following the withdrawal of services.
  - Whether there is any need to breakdown the infrastructure costs / charge base into UK Link Gemini, and non-UK Link Gemini.
- The UK Link Manual
- Change Management Procedures:
  - Paragraph 4.8.5(a)(ii) covering who can raise Change Proposals relating to UK Link Gemini.
  - Paragraph 5.2.3 covering who can raise UK Link Modification proposals relating to UK Link Gemini.

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 UNC 0801
 Page 5 of 9
 Version 4½.0

 Modification
 09 February 2022

- DSC Terms and Conditions
  - Whether there is any need to continue to acknowledge that UK Link Gemini is owned by National Grid NTS and Licensed to the CDSP.

Any other necessary changes to the documents as a consequence of the removal of Gemini services.

A subsequent DSC Change Proposal will be raised to enact these changes.

#### For information:

#### Governance for Gemini replacement system

Once CDSP services are removed from the DSC, then they are no longer under the governance of the DSC. In parallel to developing any replacement system for Gemini, then National Grid will also put in place new governance arrangements for the services offered on such a system. This will be developed in line with the following principles:

- Coordination with existing Committees, and with the CDSP.
- Same or materially similar voice/rights for relevant parties (NGG, DNs, shippers) in the change management process.
- Change management arrangements will be documented, transparent and subject to UNC governance.
- New governance arrangements will be developed with input from, and in consultation with industry.

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## 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**

The Apollo project will result in annual efficiency savings, which all other things being equal should ultimately be passed on to consumers in the form of lower bills.

## What is the current consumer experience and what would the new consumer experience be?

The consumer experience should not be directly affected as consumers do not interface with Gemini.

Impact of the change on Consumer Benefit Areas:		
Area	Identified impact	
Improved safety and reliability	None	
No direct impact on consumers.		

 UNC 0801
 Page 6 of 9
 Version 42.0

 Modification
 09 February 2022

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Lower bills than would otherwise be the case	Positive
The Apollo project will result in annual efficiency savings, which all other things	
being equal will ultimately be passed on to consumers in the form of lower bills.	
Reduced environmental damage	Positive
A more adaptive system design should facilitate the speed of change as the	
industry moves to a net zero status (e.g. hydrogen supply and consumption)	
Improved quality of service	None
No direct impact on consumers.	
Benefits for society as a whole	None
No direct impacts identified (beyond the cost and environmental aspects already	
identified above)-	

## **Cross-Code Impacts**

As the CDSP currently provides the service directly to National Grid NTS through obligations in the UNC and DSC, no other Codes will be impacted.

#### **EU Code Impacts**

None.

## **Central Systems Impacts**

There are no direct impacts upon central systems from this modification. This proposal would <a href="mailto:enable-the">enable-the</a> removal ofe certain <a href="mailto:capacity">capacity</a>, balancing and invoicing services from the <a href="mailto:CDSP">CDSP</a> and the <a href="mailto:Gemini system">Gemini system</a>. It would <a href="mailto:also-enable-these services">also-enable-these services</a> to be provided by an alternative system.

In order to minimise the impact upon shippers then a 'translation' layer will be put in place that will maintain compatibility with the existing file transfer and API protocols. Thereby Users can continue to use their existing system set up, and can choose at a time of their convenience when to integrate more directly to the new system.

## 7 Relevant Objectives

### Impact of the Modification on the Transporters' Relevant Objectives:

Relevant Objective		Identified impact
a)	Efficient and economic operation of the pipe-line system.	Positive
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.	None
c)	Efficient discharge of the licensee's obligations.	None

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.	None
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 proposal would further relevant objective a) by achieving efficiency savings in the delivery of capacity and balancing services, and in the delivery of changes to those services. It will also enhance operational capability including 24/7 availability and new APIs using the latest technology.

## 8 Implementation

No implementation timescale is proposed at this time. It can be noted that any replacement system would take some time to deliver (approximately 2 years at current estimates) so implementation could be expected around mid-2024, and no earlier than 2023. Until alternative provisions are in place to provide the relevant services, then the existing obligations to provide them would continue under the current framework.

If a new system were to be delivered, then – for awareness - it should be noted that a temporary systems design 'freeze' would <u>likely</u> need to be put in place. This is because a fixed set of requirements would be required to deliver v1.0 of any new system.

## 9 Legal Text

Legal text will be drawn up by the relevant Transporter at a time when the Modification is sufficiently developed in line with the <u>Legal Text Guidance Document</u>.

## **Text Commentary**

To be provided in due course.

### **Text**

To be provided in due course.

## 10 Recommendations

## **Proposer's Recommendation to Panel**

Panel is asked to:

- Agree that Authority Direction should apply.
- Refer this proposal to a Workgroup for assessment.