

UNC Final Modification Report	At what stage is this document in the process?								
<h1>UNC 0811S</h1> <h2>Shipper Agreed Read (SAR) exceptions process</h2>	<table border="1"><tr><td>01</td><td>Modification</td></tr><tr><td>02</td><td>Workgroup Report</td></tr><tr><td>03</td><td>Draft Modification Report</td></tr><tr><td>04</td><td>Final Modification Report</td></tr></table>	01	Modification	02	Workgroup Report	03	Draft Modification Report	04	Final Modification Report
01	Modification								
02	Workgroup Report								
03	Draft Modification Report								
04	Final Modification Report								
<p><b>Purpose of Modification:</b> To provide a remedy for SARs that have failed to be progressed (exceptions) within a reasonable period to be proactively managed by the Central Data Services Provider (CDSP)</p>									
<p><b>Next Steps:</b> The Panel determined that this Self-Governance Modification should be implemented.</p>									
<p><b>Impacted Parties:</b> High: Shippers and Suppliers Low:</p>									
<p><b>Impacted Codes:</b> None identified as this is a matter for parties to the UNC</p>									

Contents		
1	Summary	3
2	Governance	3
3	Why Change?	4
4	Code Specific Matters	4
5	Solution	4
6	Impacts & Other Considerations	8
7	Relevant Objectives	10
8	Implementation	11
9	Legal Text	11
10	Consultation	11
11	Panel Discussions	12
12	Recommendations	13
13	Appendix 1	14
14	Appendix 2	16
15	Appendix 3 Representations	16
Timetable		
<b>Modification timetable:</b>		
Pre-Modification Discussed	23 June 2022	
Date Modification Raised	23 June 2022	
New Modification to be considered by Panel	21 July 2022	
First Workgroup Meeting	28 July 2022	
Workgroup Report to be presented to Panel	20 December 2022	
Draft Modification Report issued for consultation	20 December 2022	
Consultation Close-out for representations	10 January 2023	
Final Modification Report available for Panel	11 January 2023	
Modification Panel decision (at short notice)	19 January 2023	

 Any questions?

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## 1 Summary

### What

At present the Central Data Service Provider (CDSP) does not intervene when an estimated transfer read needs to be amended in line with an agreed Shipper Agreed Read (SAR). The incoming Shipper should attempt to replace the estimated transfer read with the agreed SAR. If this fails to be accepted or cannot be replaced, due to incorrect read history, then both parties should raise a Request for Adjustment (RFA) within 4 days of each other.

This Modification will provide a remedy for SARs that have failed to be progressed (exceptions) within a reasonable period, to be managed by the Central Data Services Provider (CDSP).

### Why

Some Shippers do not submit replacement reads nor raise RFAs, leading to imbalances for the other Shippers. Also, it may cause future read issues for the incoming Suppliers if the transfer read is not corrected.

### How

Both Shippers should attempt to amend the transfer read in line with the SAR within 2 months after it was agreed. If this has not occurred, then the CDSP can be contacted for support to reconcile both sides, in line with the new agreed transfer read.

When the CDSP needs to be contacted for support, the Shipper should provide them with suitable evidence of the new agreed read. The CDSP will then notify the other Shipper of the pending exception and will, in the absence of any relevant objection, action the other Shippers request.

## 2 Governance

### Justification for Self-Governance

This Modification is suitable for Self-Governance as it is unlikely to have a material effect as it simply provides an exception process to ensure agreed reads that have not been actioned in a reasonable period are updated in central systems in a timely fashion.

### Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- be assessed by a Workgroup.

### Workgroup's Assessment

Workgroup Participants did not raise any concerns regarding this Modification being subject to Self-Governance procedures.

One Workgroup Participant argued that the consequence of this Modification is a *de-minimus* and that this is justification for Self-Governance.

### 3 Why Change?

At present the Central Data Service Provider (CDSP) does not intervene when an estimated transfer read needs to be amended in line with an agreed Shipper Agreed Read (SAR). The incoming Shipper should attempt to replace the estimated transfer read with the agreed SAR. If this fails to be accepted or cannot be replaced, due to incorrect read history, then both parties should raise a Request for Adjustment (RFA) within 4 days of each other.

This Modification will provide a remedy for SARs that have failed to be progressed (exceptions) within a reasonable period, to be managed by the Central Data Services Provider (CDSP).

Some Shippers do not submit replacement reads nor raise RFAs, leading to imbalances for the other Shippers. Also, it may cause future read issues for the incoming Suppliers if the transfer read is not corrected.

Both Shippers should attempt to amend the transfer read in line with the SAR within 2 months after it was agreed. If this has not occurred, then the CDSP can be contacted for support to reconcile both sides, in line with the new agreed transfer read.

When the CDSP needs to be contacted for support, the Shipper should provide them with suitable evidence of the new agreed read. The CDSP will then notify the other Shipper of the pending exception and will, in the absence of any relevant objection, action the other Shippers request.

### 4 Code Specific Matters

#### Reference Documents

UNC TBD Section E and Section M

#### Knowledge/Skills

Shipper Agreed Read processes

### 5 Solution

#### Shipper Agreed Read (SAR) exceptions process principle

Both Shippers should attempt to amend the transfer read in line with the SAR within 2 months after it was agreed. If this has not occurred, then the CDSP can be contacted for support to reconcile both sides in line with the new agreed transfer read. To ensure this the CDSP will not accept a request if it is submitted less than 2 months since the date of the Opening Meter Read.

When the CDSP needs to be contacted for support, the Shipper should provide them with suitable evidence of the new agreed read. The CDSP will then notify the other Shipper of the pending exception and will in the absence of any relevant rejection action the other Shipper's request in accordance with the following Business Rules

Negative Meter Readings will be rejected. By this we mean, if the subsequent Meter Reading is lower than the Proposed Agreed Meter Reading, it cannot be loaded in the system. If however, this subsequent Meter Reading is an estimate, regardless of whether it is lower, the Proposed Agreed Meter Reading could be loaded. Essentially, if an Actual subsequent Meter Reading is lower than the Proposed Agreed Meter Reading, it will prevent it being loaded

#### Business Rules (BRs)

**BR1:** Where the Withdrawing User and the Proposing User agree a revised value of a Meter Reading (Agreed Opening Meter Reading) either:

a) The Withdrawing User should be allowed to submit a Proposed Agreed Opening Meter Reading to the CDSP. The Proposed Agreed Opening Meter Reading cannot be submitted ahead of the Opening Meter Reading (including an estimate) being fulfilled and notified to the Withdrawing Shipper as per UNC TPD M 5.13.9 timescales.

or

b) The Proposing User should be allowed to submit a Proposed Agreed Opening Meter Reading to the CDSP if the Agreed Opening Meter Reading would fail the Outer Tolerance validation check. The Proposed Agreed Opening Meter Reading cannot be submitted ahead of the Opening Meter Reading (including an estimate) being fulfilled and notified to the Withdrawing Shipper as per UNC TPD M 5.13.9 timescales.

**Guidance for BR1:** Currently only the Proposing User can submit the Agreed Opening Meter Reading (UNC M 5.13.12). This is a change to allow the Withdrawing User to submit a Proposed Agreed Opening Meter Reading. If this read isn't rejected by the Proposing User, it will have the same effect as an Agreed Opening Meter Reading (e.g. resulting in an Offtake Reconciliation). There is no agreed window in UNC for the Proposing User to submit the Agreed Opening Meter Reading. Based on this we've suggested the Withdrawing User can submit this once they have been notified of the Opening Meter Read.

For the avoidance of doubt, the existing Agreed Opening Meter Reading process will not be changed as a result of this Modification.

The Proposing User may only use this process if the Agreed Opening Meter Reading will fail the Outer Tolerance validation check as in all other cases the existing Agreed Opening Reading process is available to them.

**BR2:** The Proposed Agreed Opening Meter Reading should, where relevant, not be subject to Inner or Outer Tolerance validation as per the UNC Validation Rules.

**BR3:** Where the Proposed Agreed Opening Meter Reading will cause a failure of the Outer Tolerance check, upon submission of this read to the CDSP, the submitting User must acknowledge that the Proposed Agreed Opening Meter Reading will cause a failure to the Outer Tolerance check but state that the read is agreed and should still be accepted and processed.

**BR4:** Where the Proposed Agreed Opening Meter Reading is submitted, before the reading is accepted by the CDSP and the Offtake Reconciliation in relation to the Withdrawing User is revised (as per UNC TPD M 5.13.13), the CDSP must notify the non-submitting User of the Proposed Agreed Opening Meter Reading being submitted.

**BR5:** The non-submitting User will be given 20 Supply Point System Business Days (SPSBDs) from the point of the CDSP notification to reject the Proposed Agreed Opening Meter Read submitted. For the avoidance of doubt, the only valid reason to reject the Proposed Agreed Opening Meter Read is where the non-submitting User believes they have not previously agreed to the read.

**Guidance for BR5:** For the avoidance of doubt and recognising the exceptional number of Supplier of Last Resort (SoLR) events the only valid reason to reject does include the scenario where the non-submitting user inherited a SAR which they do not agree with i.e. the previous Shipper has agreed but they have not agreed to the read.

**BR6:** Following the 20 Supply Point System Business Days (SPSBDs), if a valid rejection has not been raised, the Proposed Agreed Opening Meter Reading submitted will progress and conditions within UNC TPD M 5.13.13 in relation to the Agreed Opening Meter Reading should apply.

**BR7:** Where a valid rejection is raised i.e. the non-submitting User believes they haven't agreed the read previously, within the agreed timescale, the Proposed Agreed Opening Meter Reading should not be progressed and the conditions within UNC TPD M 5.13.13 will not be applied.

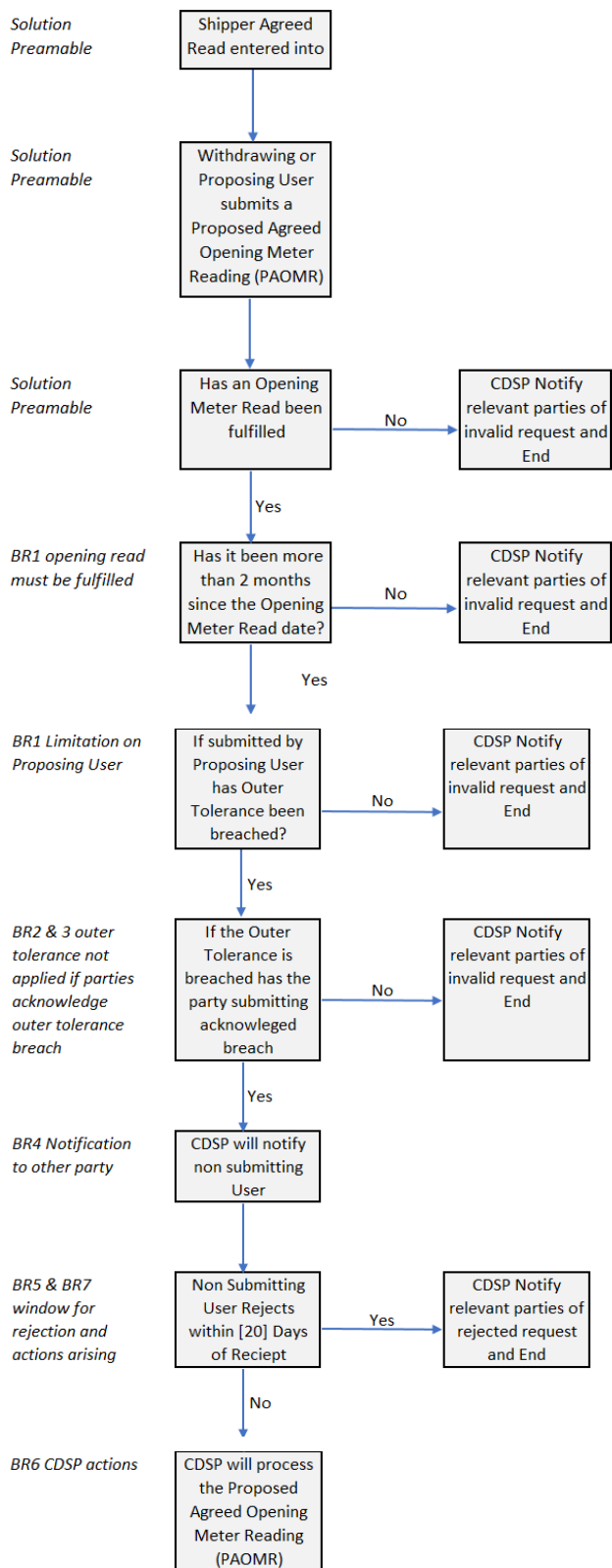
**Guidance for BR7:** For the avoidance of doubt, in this circumstance, resolution should be managed outside of UNC between the Withdrawing and Proposing Users.

**BR8:** If the Proposed Agreed Opening Meter Reading is rejected, the existing Opening Meter Reading will persist. For avoidance of doubt this could be an actual or estimate read.

### **Supplemental**

A new PARR report will be expected to monitor this process. This could include information such as e.g. the Number of Proposed Agreed Opening Meter Readings submitted by Withdrawing or Proposing Users and the Number of appeals submitted.

Flow Diagram



## 6 Impacts & Other Considerations

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

No. All Workgroup Participants agreed.

### Consumer Impacts

The inclusion of an exceptions process will avoid the risk of agreed reads not being actioned in a timely fashion which could have consequential impacts on consumers e.g. consumers being billed by the relevant Shipper for the energy associated with the agreed read.

Some Workgroup Participants agreed that this Modification should improve the process for consumers in that it should reduce the period for which estimated reads might otherwise apply.

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

If this Modification is not implemented, then in the situations contemplated by the Modification the agreed read will not be updated with central systems which could have consequential impacts on consumers. If implemented this exceptions process, were utilised, would remove the risk of agreed reads not being actioned in a timely fashion.

Impact of the change on Consumer Benefit Areas:	
Area	Identified impact
Improved safety and reliability	None
Lower bills than would otherwise be the case	None
Reduced environmental damage	None
Improved quality of service	<p>Positive - The inclusion of an exceptions process will avoid the risk of agreed reads not being actioned in a timely fashion which could have consequential impacts on consumers e.g. consumers being billed by the relevant Shipper for the energy associated with the agreed read.</p> <p>Workgroup Participants agreed with the Proposer, noting this is of particular importance in the current high gas price situation.</p>
Benefits for society as a whole	None

Workgroup Participants agreed that the Modification would improve on the current position.

### Cross-Code Impacts

None identified.



## EU Code Impacts

None identified. Workgroup Participants did not raise any concerns.

## Central Systems Impacts

The impact of the Modification Solution on Central Systems has been assessed. A DSC Change relating to this Modification 0811S has been raised and will be considered at the January 2023 DSC Change Management Committee.

The CDSP Service Area applicable for this Modification is likely to be Service Area 1 (Managed Shipper Transfers), however this will be discussed by the DSC Change Management Committee. The funding associated by default with Service Area 1 is 100% Shipper (this can be changed by the relevant DSC Committee).

Workgroup Participants agreed with this funding allocation and approach, noting it will be discussed and agreed at DSC Change Management Committee in January 2023.

Workgroup Participants welcomed the clarity afforded by the introduction of this information at this stage in the process.

## Rough Order of Magnitude (ROM) Assessment

The ROM<sup>1</sup> was considered within the October 2022 Workgroup meeting. It was confirmed by the CDSP representative that at the level of the ROM analysis there is no expectation of a need to create a new file format. It was also stated that based on current understanding of the Modification, this is intended to be an exceptions process suggesting the ongoing volumes should not be significant. The current proposal is to manage this under CMS.

Rough Order of Magnitude (ROM) Assessment	
Cost estimate from CDSP	High level indicative delivery costs are anticipated to be between £70,000 and £130,000.  As the possible volumes for this process are currently unknown, we are unable to confirm if ongoing costs are anticipated as a result of the change being implemented. This will be confirmed in the Detailed Analysis / Design phases of developing this change.
Timescale	Based on the high-level analysis, the indicative effort for delivery is circa 35 to 45 weeks. The high-level estimate to develop and deliver this change, however, is proposed to align to the timescale of the Major Release the change is scoped into.

## Performance Assurance Considerations / Draft PARR

A draft PARR prepared by the CDSP was considered at the October 2022 meeting. Workgroup Participants concluded that it would be inappropriate to set out a report that may constrain the ability of PAC to monitor performance and that Workgroup Participants are not aware of the other matters being monitored that may interact. Workgroup Participants concluded that the draft example was provided for information only to prompt

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<sup>1</sup> <https://www.gasgovernance.co.uk/sites/default/files/ggf/book/2022-10/ROM%20Response%20-%20Modification%200811%20V1.0A.pdf>

discussion and is attached to this report as an appendix. The reporting (if any) will require development by PAC and consideration given to other aspects monitored by PAC.

### Workgroup Impact Assessment

Workgroup Participants did not raise any concerns or comments other than those noted above.

## 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.	None
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: (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.	Positive
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

The Modification furthers Relevant Objective *d) Securing of effective competition: (i) between relevant shippers and (ii) between relevant suppliers* as it provides an exception process to ensure that energy is correctly reconciled between parties.

No Workgroup Participants raised any objections to the argument put forward above.

The Modification is also positive in relation to relevant objective *f) Promotion of efficiency in the implementation and administration of the Code* as currently some Shipper Agreed Reads are not being actioned in a timely and efficient manner and this proposal will address those situations by providing a suitable remedy.

Some Workgroup Participants agreed as this could enable settlement to work faster, this Modification could also help to improve Shipper's read performance (once initial reads are accepted, other reads can flow in behind). No Workgroup Participants raised any objections to the argument put forward above.

## 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 and also subject to any Central System changes needed to deliver the solution.

Workgroup Participants noted the comments made within the ROM report that implementation is best aligned with a Major Systems release date. This is because there are some consequential systems changes which don't impact Shippers but are matters for the CDSP to deal with.

Workgroup Participants noted that this Modification could be delivered as part of the November 2023 UK Link major release at the earliest, subject to DSC Change Management Committee decision making.

## 9 Legal Text

Legal Text has been provided by WWU and is published alongside this report.

### Workgroup Assessment

The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution.

### Text Commentary

New sections M 5.13.17 to 5.13.21 of the Transportation Principal Document provide for a new facility for Users to submit and agreed opening meter reading (a "Corrective Opening Meter Reading"), where an Agreed Opening Meter Reading has not been established within two months of the Opening Meter Reading Date. The Corrective Opening Meter Reading will be subject to different Validation Rules than those that apply standard Opening Meter Readings. It is understood that if the Modification Proposal is implemented the Validation Rules will be modified accordingly. Other provisions of Section M are amended to recognise the new process where appropriate.

Section E 6.5.1(b) is amended so that in the event that a Corrective Opening Meter Reading is agreed, appropriate reconciliation will take place under Section E 6.5.2.

The amendment to Transition Document Part IIF corrects a cross-referencing error in the Transition Document so that it refers, as appropriate, to the existing section M 5.13.15 instead of the new section M5.13.17 added as a result of this Modification Proposal.

### Text

Legal Text is published alongside this report here: <https://www.gasgovernance.co.uk/0811>.

## 10 Consultation

Panel invited representations from interested parties on 15 December 2022. All representations are encompassed within the Appended Representations section.

The following table provides a high-level summary of the representations.

Implementation was unanimously supported in the 4 representations received.

Representations were received from the following parties:		
Organisation	Response	Relevant Objectives
Centrica	Support	d) positive f) positive
Scotland Gas Networks Ltd & Southern Gas Networks Ltd	Support	d) positive f) positive
SEFE Energy	Support	d) positive f) positive
SSE Energy Supply Ltd	Support	d) positive f) positive

Please note that late submitted representations will not be included or referred to in this Final Modification Report. However, all representations received in response to this consultation (including late submissions) are published in full alongside this Report and will be taken into account when the UNC Modification Panel makes its assessment and recommendation.

## 11 Panel Discussions

### Discussion

The Panel Chair summarised that this Modification would provide a remedy for Shipper Agreed Reads that have failed to be progressed (exceptions) within a reasonable period to be proactively managed by the Central Data Services Provider (CDSP).

Panel Members considered the representations made noting that implementation was unanimously supported in the 4 representations received, and that a further late representation received on 11 January 2023 was also in support of the proposal.

Panel Members agreed that this Modification would provide a means for Shipper Agreed Reads to be updated by the Central Data Services Provider if the Shipper fails to update the read.

### Implementation date

Panel Members noted that this change would need to align to the necessary central system changes which could be delivered at the earliest, as part of the November 2023 UK Link major release, subject to DSC Change Management Committee decision making. This should allow any Shipper organisations who needed to make system changes to remedy this in the intervening period.

### Performance Assurance Considerations

PAC will determine whether there is a risk to settlement and will determine whether there is a need to monitor the performance associated with changes brought forward by this Modification.

### Consideration of the Relevant Objectives

Panel Members considered Relevant Objective d) *Securing of effective competition between Shippers and/or Suppliers*, agreeing that the Modification would enable the remedy of Shipper Agreed Read exceptions which ensures that energy is correctly reconciled between Parties.

Panel Members considered Relevant Objective f) *Promotion of efficiency in the implementation and administration of the Code*, agreeing this Modification would enable Shipper Agreed Reads to be actioned in a timely manner.

There is likely to be an impact on the IGT-UNC as there are many cross references to the area of UNC referred to for this Modification, which IGT-UNC will address going forward.

### **Determinations**

Panel Members voted unanimously that no new issues were identified as part of consultation.

Panel Members voted unanimously that Modification 0811S has Cross Code impacts for IGT-UNC.

Panel Members voted unanimously (14 votes in favour out of 14) to implement Modification 0811S.

## **12 Recommendations**

### **Panel Determination**

Panel Members agreed that Modification 0811S should be implemented.

## 13 Appendix 1

### Appendix 1 document – INDICATIVE EXAMPLE OF PARR in relation to Modification proposal 0811S

Report Title	<b>Shipper Agreed Read (SAR) Exceptions Process</b>
Report Reference	TBC
Report Purpose	To monitor the Shipper Agreed Read (SAR) exceptions process implemented as a result of Modification 0811.
Expected Interpretation of the report results	The aim is to monitor the use of the SAR exceptions process. The report should identify the Shippers utilising this process and the outcome of the process being triggered.
Report Structure (actual report headings & description of each heading)	<p>Month</p> <p>Shipper Short code (SSC)</p> <p>Count of [PAOMRs*] submitted by Withdrawing User</p> <p>SSC of the Proposing User</p> <p>Count of [PAOMRs] submitted which breach Outer Tolerance</p> <p>Count of [PAOMRs] rejected by Proposing User</p> <p>Count of [PAOMRs] submitted by Proposing User</p> <p>Count of invalid [PAOMRs] submitted**</p> <p>Count of [PAOMRs] rejected by Withdrawing User</p>
Data inputs to the report	<p>SSC</p> <p>Count of [PAOMRs] submitted and by which User (Proposing or Withdrawing)</p> <p>Count of rejections of the [PAOMR] progressing</p> <p>Count of [PAOMRs] that breach the Outer Tolerance</p>
Number rounding convention	Whole numbers and values
History (e.g. report builds month on month)	A Rolling 12-month view, provided monthly
Rules governing treatment of data inputs (actual formula/specification to prepare the report)	<p>The report will include the values and figures based on the [Proposed Agreed Opening Meter Reading] and rejections received within the month they are being recorded against.</p> <p>The report is prepared as soon as possible after the end of the calendar month.</p> <p>DN and IGT sites are included.</p>

Frequency of the report	Monthly
Sort criteria (alphabetical ascending etc.)	Shipper Short code alphabetically
History/background	Introduced to monitor the process introduced under UNC Modification 0811
Relevant UNC obligations and performance standards	[TBC – dependent on the 0811 legal text] <i>Current obligations regarding SARs are within TPD Section M – Clause 5.13.</i>
Additional information	N/A

**Example Reports:**

Example report 1 – [PAOMR] submitted by the Withdrawing User

	Month 1				Month 2
	Count of [PAOMRs*] submitted by Withdrawing User	[SSC of the Proposing User]	Count of [PAOMRs] submitted which breach Outer Tolerance	Count of [PAOMRs] rejected by Proposing User	
Shipper A					
Shipper B					
Etc.					
<b>Industry Totals</b>					

*\*[PAOMR] is the proposed term for the read being submitted under this exceptions process – [Proposed Agreed Opening Meter Read].*

Example report 2 – [PAOMR] submitted by the Proposing User

	Month 1			Month 2
	Count of [PAOMRs] submitted by Proposing User	Count of invalid [PAOMRs] submitted**	Count of [PAOMRs] rejected by Withdrawing User	
Shipper A				

Shipper B				
Etc.				
<b>Industry Totals</b>				

*\*\*As per Modification 0811, the only reason a Proposing User could submit a [PAOMR] is if the Shipper Agreed Read would be rejected due to an Outer Tolerance breach. Therefore a [PAOMR] would be considered invalid if submitted by the Proposing User and would not breach Outer Tolerance. In this scenario, they should utilise the existing 'Agreed Opening Meter Reading' process.*

## 14 Appendix 2

Draft of UNC Validation Rules v8.0 for approval at February 2023 UNCC.

## 15 Appendix 3 Representations

Representation – Centrica

Representation - Scotland Gas Networks Ltd & Southern Gas Networks Ltd

Representation - SEFE Energy

Representation - SSE Energy Supply Ltd



# Uniform Network Code Validation Rules

Version **8.0**

Deleted: 7

Effective Date – **TBC**

Deleted: CSS Implementation Date

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## Document Control

Version	Date	Reason for Change
<a href="#">8.0 Draft</a>	<a href="#">Modification 0811S Implementation Date</a>	<ul style="list-style-type: none"> <li>• Clarification regarding the suspension of Inner and Outer Tolerance for Corrective Opening Meter Readings.</li> <li>• Minor updates to replace Gas Transporter with CDSP.</li> </ul>
7.0 Live	CSS Implementation Date – 18/07/22	<ul style="list-style-type: none"> <li>• Changes approved by July 2022 UNCC to become effective as of CSS implementation.</li> </ul>
7.0 Draft	24/06/21	<ul style="list-style-type: none"> <li>• Further clarification regarding suspension of Inner Tolerance including functional changes effective at Central Switching Service implementation date.</li> <li>• Minor amendments following agreement at Distribution Workgroup.</li> </ul>
6.0	19/08/2021	<ul style="list-style-type: none"> <li>• Added circumstances of where the CDSP may not use the TTZ value provided by the Shipper (XRN5072)</li> <li>• Added clarity to how an inserted or replacement read is handled under the Inner Tolerance Validation (XRN5180)</li> <li>• Amended to align to 'Converter' within UNC</li> </ul>
5.2 Approved	17/10/2019	<ul style="list-style-type: none"> <li>• Added suspension of InnerTolerance validation for Class 3 supply meter points in EUC band 01</li> </ul>
5.1 For Approval	23/08/2019	<ul style="list-style-type: none"> <li>• Added circumstances where Class 3 Supply Points shall not be subject to Validation.</li> </ul>
5.0 Draft	09/08/2019	<ul style="list-style-type: none"> <li>• Added circumstances where Class 3 Supply Points shall not be subject to Validation.</li> <li>• [Proposed suspension of Inner Tolerance Validation for Class 3 Supply Points while CDSP is not Validating all Meter Readings.]</li> <li>• Amendment to reflect that following Modification 565, CDSP perform Meter Reading validation as a Direct Service (TPD M 1.4.1(b)).</li> <li>• Amendment to reflect accepted spelling of Converter.</li> </ul>
4.2 APPROVED	19/01/2019	Added circumstances where the RTC value may be derived by CDSP and where the RTC may not be used for consumption calculation.
4.1 APPROVED	03/11/2018	Changes to Class 3 and 4 Read

Deleted: 7

Joint Office of Gas Transporters  
Uniform Network Code – Validation Rules

		Tolerances to reflect change in November 2018 UK Link Release (XRN3656) and change XRN4658.
4.0 APPROVED	18/05/2017	Approved at 18 May 2017 UNCC
3.1 DRAFT	20/03/2017 (03/05/2017)	<ol style="list-style-type: none"> <li>1. Added note to Section 2.7 as the Converter tolerance check will not be applied until a change is implemented.</li> <li>2. Clarification added regarding reads that are subject to tolerance checks (Section 1.9).</li> <li>3. Moved validation based on groupings from section 1 to section 9.</li> <li>4. Amended 'read' to 'reading' where applicable throughout document</li> <li>5. Updated Class 1 &amp; 2 reads using a weighted SOQ for the read tolerance validations. Presented to industry on 09/01/2017 and approved at the MTWG on 08/02/2017 (Section 2.10 &amp; 2.11)</li> <li>6. Updated to reflect weighted AQ validation.</li> </ol> <p>Note: Amendments associated with points 5 and 6 have been included to reflect UK Link functionality following PNID. Assessment will be undertaken with Users following PNID whether this shall be amended.</p>
3.0 APPROVED	08/01/2016	Approved at 19 November 2015 UNCC
2.9 DRAFT	23/10/2015	Updated Appendix A to remove negative 'Round the Clock' indicator. Version approved by PN UNC for submission to November UNCC.
2.8 DRAFT	17/08/2015	Included process flow under Appendices
2.7 DRAFT	28/07/2015	Added validation 'groupings'. Under Section 9
2.6 DRAFT	10/06/2015	Updates to correct references & amendments to Section 5
2.5 DRAFT	29/04/2015	Updates following further analysis and discussions at Project Nexus workgroup & agreement on the read validation tolerances.
2.4 DRAFT	20/11/2013	Proposed updates for review at PN UNC
2.3 DRAFT	15/10/2013	Further updates following review
2.2 DRAFT	07/10/2013	Further updates following review at PN UNC on 30/09/2013
2.1 DRAFT	20 September 2013	Updates following Project Nexus requirements
2.0	20 January 2011	Clause 4 amended as a result of implementation of UNC0224, introduction and Document Control

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Joint Office of Gas Transporters  
Uniform Network Code – Validation Rules

		added.
1.0	05 July 2006	Rules established

## Development of Rules

- (a) Section M5.3.3 of the Transportation Principal Document (TPD) of the Uniform Network Code (UNC). specifies that:

“The "Uniform Network Code Validation Rules" (or “Validation Rules”) are the rules and procedures contained in the document issued by the Transporters at the [Project Nexus Implementation Date] and so entitled and governed and amended in accordance with Section V12 unless the Authority shall upon application by any User made within one month after such notice, give Condition A11(18) Disapproval to the Transporters making any amendment in accordance with the provisions of Section V12.”

- (b) The requirement to publish the Uniform Network Code Validation Rules is specified in Section V12.1(b) of the TPD of the UNC. This section also provides for the document to be published and revised from time to time. The provision (TPD V12.2) reads :

“Each Document shall be kept up to date and published by the Transporters on the Joint Office of Gas Transporters’ website.”

- (c) The Rules set out below meet the Transporters’ obligation to prepare Guidelines, while the Document Control Section records changes which have been made to the Guidelines. The document is published on the Joint Office of Gas Transporters’ website, [www.gasgovernance.com](http://www.gasgovernance.com).

- (d) These Guidelines can only be modified in accordance with the requirements set out in paragraph 12 of Section V of the UNC Transportation Principal Document.

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## CONTENTS

1. Introduction.	05
2. Meter Reading Validation.	09
3. Validation on Readings received as part of an Asset Update.	12
4. Class 1 DM Supply Points.	13
5. Unique Sites	14
6. Consumption Adjustments	15
7. Validation to Site Visit Readings	16
8. Tolerances Ranges	17
9. Grouping of Validations Performed	20
Appendix A - Round The Clock Indicators	22
Appendix B - Calculated Gas Card Readings.	
23Appendix C – MRA HHT Validation	
27	
Appendix D: Read Validation Process Flow	28

## 1 Introduction

This is the document referred to in Section M 5.3 of the Uniform Network Code Transportation Principal Document. It does not form part of the Uniform Network Code.

- 1.1 This document describes the validation rules which will be applied to non-daily (Class 3 and 4) and daily metered (Class 1 and 2) Supply Meter Point meter readings, read equipment, converter readings and associated data before they are applied to User and Transporter systems. All parameterised values are subject to amendment in accordance with the procedures set out in Section M 5.3.3 of the Uniform Network Code – Transportation Principal Document. Any changes will be notified to Users. References in this document to Meter Readings (reading(s)) are consistent with Section M 1.5.2 of the UNC – i.e. include converter readings as appropriate.
- 1.1.1 Following implementation of UNC Modification 0700 the CDSP is required to select a minimum of one Non Opening Meter Reading in a seven Day Batch Period for Class 3 Supply Meters on Smaller Supply Points to assess whether it is a Valid Meter Reading. The CDSP will be required to select this Meter Reading from User's Batch Submissions which must be 7 days of less in duration (M5.8.1(b)). Each Meter Reading selected shall be subject to the CDSP element of validation as described above. The CDSP shall prioritise use of a Meter Reading where the Read Date is the User 'specified date' consistent with TPD M 5.8.4 (a). **Where the CDSP is not performing Validation against every Meter Reading submitted by the User, any references within this document to CDSP Validation related to 'all' Meter Readings shall exclude Meter Readings submitted by a User but not selected by the CDSP to be subject to Validation.** The CDSP shall, for any Meter Readings submitted by a User but not subject to CDSP validation, determine whether such Meter Readings are valid for the purposes of M 5.8.5 in accordance with Appendix E.
- 1.2 These rules are the minimum requirement of validation that must be undertaken for readings applied by Users prior to submitting to the CDSP.
- 1.3 Readings from Class 1 daily metered Supply Meter Points will be validated by the Daily Metered Service Provider (DMSP) in accordance with the relevant rules described herein.
- 1.4 Readings from Class 2, 3 & 4 Supply Meter Points must be validated by the Users before submitting to the CDSP, in accordance with the relevant rules described herein.

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1.5 Readings that do not pass the validations described will be rejected by the CDSP with the relevant rejection reason.

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1.6 The validation described in this document will be in addition to that used to determine that the data is in accordance with the file specification and system requirements.

1.7 The validation refers to cyclic and non-cyclic meter readings, including transfer readings, consumption adjustments and readings provided with, or derived as a result of, RGMA transactions.

1.8 In addition to User validation, the CDSP will undertake a two step validation process as described in Section 2 below for all readings listed under Section 1.9, subject to the following exclusions;

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1.8.1 An initial tolerance check (Inner Tolerance) that can be overridden by the User. The override flag can be submitted with the reading or on re-submission of the reading following rejection. This Inner Tolerance validation will be suspended for the following Meter Reading types or sources:

- a) a Meter Reading submitted with a Meter Information Notification;
- b) a Meter Reading submitted with a Meter Information Update Notification;
- c) an Opening Meter Reading for a Class 3 or 4 Supply Meter;
- d) a Meter Reading submitted by a User once it has become the Registered User and submitted prior to an Opening Meter Reading being submitted or otherwise determined in accordance with paragraph M 5.13.4;
- e) a Meter Reading obtained in accordance with paragraph M 5.10, and submitted prior to the fulfilling of an Opening Meter Reading being submitted or otherwise fulfilled; or
- f) Smaller Supply Point Class 3 Supply Meters - with the exception of Check Read following a Site Visit Readings where this will still be applied. For the avoidance of doubt, Users shall continue to perform this validation as they will maintain contiguous Meter Readings

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g) a Corrective Opening Meter Reading submitted and agreed by Proposing and Withdrawing Users.

1.8.2 Must Reads Inner Tolerance Validation may be overridden by the CDSP where, following ITR failure the CDSP manually assess the Meter Reading(s) and determine that the Meter Reading has been obtained from the asset recorded on UK Link systems and accords with the Meter Reading history.

1.8.3 Where the submitted read is for an Actual Read Date between two existing reads, be that by insertion or by update to an existing read, then the override flag, if supplied, shall be considered for the validation of backward (i.e. related to consumption periods prior to the submitted read) and forward (i.e. related to consumption periods subsequent to the submitted read) consumption periods. For the avoidance of doubt, the override flag must be provided where either one, or both, consumption periods breach the Inner Tolerance validation.

1.8.4 The second test (Outer Tolerance) will be applied if the reading or consumption adjustment passes the Inner Tolerance check. Where the reading or consumption adjustment fails this test the reading will be rejected and can not be overridden.

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1.8.5 Where a Corrective Opening Meter Reading has been submitted and agreed by Proposing and Withdrawing Users then the Outer Tolerance tests may be overridden by the User submitting the reading.

1.9 The tolerance check validation will apply to energy calculated from the following;

- Actual cyclic readings (including reads from AMR/Dataloggers)
- Actual non-cyclic readings
- Site Visit reads (Check Reads). See section 7
- Readings received as part of, or derived as a result of, an RGMA transaction (excluding installation readings) - See section 3
- Opening (Transfer) Reading
- Must Read
- Consumption Adjustments
- Class change reading

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- Replacement readings
- CDSP Estimated Read (Outer Tolerance only will be applied)

1.10 On submission of the read communication by the Shipper, the CDSP will perform a set of validations based on 3 groupings, please see Section 9 for further detail:

Set 1: Read Submission-

Set 2: Asset

Set 3: Read Validation-

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## 2. Meter Reading Validation

- 2.1 A completeness check to ensure all readings expected have been received, including converter readings where a converter is installed.
- 2.2 All meter readings will be subjected to a Round the Clock test to detect possible instances where a meter has made a complete revolution of the dials between readings. The Round the Clock test will be checked against the previous actual reading not the estimated reading, including estimated transfer readings.

The term Round the Clock (RTC) refers to the number of times the meter or converter has gone "through the zero's" (TTZ) e.g. has moved from 9999 to 0001. The use of this indicator and the reading will permit the volume of gas to be calculated as well as detecting any reversal of readings following an earlier erroneous reading. A detailed explanation of the logic is given in Appendix A.

All meter readings provided by Shipper Users, except for those associated with Meter Information Notifications and Meter Information Update Notifications, require that the Round the Clock indicator is populated. In circumstances described in Appendix A, the CDSP may recalculate the Round the Clock value for a valid meter reading already recorded in the UK Link system.

Where the CDSP is not assessing all Meter Readings submitted as to whether they are Valid (UNC Modification 0700 refers) the CDSP will prioritise the utilisation of Meter Readings where a non zero Round the Clock value is provided for Non Opening Meter Readings for Class 3 Supply Meters for Smaller Supply Points. Where the non-zero Round the Clock value and a User 'specified date' are contained within the same Batch Period the CDSP shall seek to use both Meter Readings.

- 2.3 Validation to ensure the read is equal to or greater than a previous actual reading (not estimated reading), in addition, for replacement reads, the read must be less than or equal to a subsequent actual read.
- 2.4 All readings supplied by Users, including readings received as an asset update (with the exception of installation reads and a Corrective Opening Meter Reading) and replacement reads, will be subject to tolerance checking as described below.
- 2.5 An Inner Tolerance validation will be applied to all readings as described in Section 8
  - 2.5.1 The User may 'override' the 'Inner Tolerance Check' by indicating as such when submitting the reading.

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a) The CDSP will not apply this Inner Tolerance validation on readings for Smaller Supply Point Class 3 Supply Meters, with the exception of Check Read following a Site Visit Readings where this will still be applied.

b) Where the Actual Read Date of the submitted read is between two existing reads then the CDSP will assess the requirement for the override flag against the backward and forward consumption periods. If supplied, the read will pass this validation provided that one or both of the consumption periods breach the Inner Tolerance validation.

c) Where a Corrective Opening Meter Reading is submitted and agreed by Proposing and Withdrawing Users.

2.5.2 A further tolerance check (Outer Tolerance check) will be applied, a reading that breaches the Outer Tolerance check will be rejected by the CDSP (with the exception of a Corrective Opening Meter Reading).

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2.5.3 Tolerance ranges will be based on the AQ band for a Supply Meter Point. Tolerance Ranges are shown in Section 8.

2.6 The tolerances will be applied using the previous actual meter reading, including an installation read.

2.7 Where a converter is installed additional checks will be performed to ensure that the converter is reading meter pulses correctly. The following checks will be performed. The check will not be applied to a Variable Pressure site.

2.7.1 Calculate;  
(Converter Corrected Volume / Meter Read Volume) / Meter Point Correction Factor

2.7.2 A Converter Tolerance check will be applied on the 'Ratio' between the converter reads and meter reads:

Ratio = Vol 1 / Vol 2 / Meter Correction Factor

Where;

Vol 1 = Volume calculated using converter corrected reads  
Vol 2 = Volume calculated using converter uncorrected reads, or meter reads if uncorrected reads are not available

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2.7.3 The tolerance ranges are:

Class 1 & 2 meter points: 0.95 to 1.05  
Class 3 & 4 meter points: 0.85 to 1.15

**Note: The tolerance validations described under section 2.7 will not be applied. This will apply to all meter points in Class 1, 2, 3 & 4. This validation will not be performed until a change in functionality to the reading validation rules is delivered.**

2.8 Reads submitted as part of an asset update will be subject to read validations with the exception of installation reads.

2.9 Replacement reads will only be accepted if a reading for the same date is recorded on UKLink.

2.10 For Class 1 & 2 meter points where an actual is received following an estimated reading, including an estimated transfer reading, within GFD+5 the following will apply:

2.10.1 On receipt of the actual reading it will be validated to ensure equal to or greater than the previous actual reading.

- If yes, accept the actual reading
- If no, reject

2.10.2 Tolerance validations will be applied using the previous actual reading.

2.10.3 For Class 1 or 2 Supply Meter Points the read tolerance validation will use a weighted SOQ to validate the read. The weighted SOQ is derived between the last actual read and the current read to define the maximum allowed consumption (this will take account of any changes in the SOQ during the period from the last actual read to the previous actual read).

$$\text{i.e. Weighted SOQ} = \frac{(\text{SOQ}^1 * \text{No of Days}) + (\text{SOQ}^2 * \text{No of Days})}{\text{Total No of Days}}$$

2.10.4 Where the actual reading is accepted the consumption and energy will be calculated from the previous actual reading and new estimate(s) calculated, 'better estimate', for the gas day.

2.10.5 The Tolerance Ranges applied shall use the Weighted AQ –

$$\text{i.e. Weighted AQ} = \frac{(\text{AQ}^1 * \text{No of Days}) + (\text{AQ}^2 * \text{No of Days})}{\text{Total No of Days}}$$

2.11 For Class 3 & 4 meter points where an actual is received following an estimated transfer or Class change reading, the following will apply:

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- 2.11.1 On receipt of the actual reading it will be validated to ensure equal to or greater than the previous actual reading.
- If yes, continue validation
  - If no, reject
- 2.11.2 Tolerance validations will be applied using the previous actual reading
- 2.11.3 The AQ will be used to determine which Tolerance Band shall be utilised.
- 2.11.3.1 The current effective AQ on the date of the read will be used for the purposes of the read tolerance validation following a transfer with an estimated reading, where the transfer did not effect a Class change.
- 2.11.3.2 The Weighted AQ will be used for the read tolerance validation following a Class change with an estimated reading.
- 2.11.4 Where there is a change in the Class of the Supply Meter Point from Class 3 or 4 to Class 1 or 2, and an estimated Class change read is calculated and recorded, the next valid actual read received will be validated back to the previous actual read and will use a weighted SOQ for the purposes of the read tolerance validation. The weighted SOQ is derived between the last actual read and the current read to define the maximum allowed consumption (this will take account of any significant changes in the SOQ during the period of the Class change from the last actual read to the previous actual read)
- 2.11.5 Where the actual reading is accepted the consumption and energy will be calculated from the estimated transfer reading.

### **3. Validation on Readings received as part of, or derived as a result of, an Asset transaction**

- 3.1 Readings submitted within, or derived as a result of, an RGMA transaction (other than an installation reading) will be validated against the 'Outer Tolerance' check. If the read fails the tolerance, the transaction will be rejected.
- 3.2 An asset removal will be rejected if actual readings exist after the effective date of the asset removal.
- 3.3 If the asset is recorded as removed, readings will not be accepted for a read date after the effective date of the asset update.

#### 4. Class 1 DM Mandatory Supply Points

For all non Telemetered Class 1 Supply Meter Points the daily readings are obtained and submitted by the Daily Metered Service Provider (DMSP).

The validations described will be performed by the DMSP on non-telemetered Class 1 Supply Meter Points.

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## 5. Non Standard Supply Meter Points (formerly known as Unique Sites)

The meter read tolerance validation described in Section 8 will be performed on the portfolio of Supply Meter Points formerly known as unique sites with the exception of NTS & LDZ Telemetered Supply Meter Points..

The Supply Meter Points that are currently known as unique sites are;

- All NTS sites including Direct Connect sites, Connected System Operator (CSO) sites and Shared Supply Meter Points
- NTS Interconnectors
- LDZ Telemetered sites
- LDZ Connected System Operator (CSO) sites
- LDZ sites with NTS Optional Rate and/or LDZ Optional Rate
- LDZ Shared Supply Meter Points
- LDZ Site with Specific Calorific Values (CV)
- LDZ Sites with any Special Metering Arrangements in place

Note: The reads for the above site types will continue to be obtained by the DMSP, or in the case of telemetered Supply Meter Points, by NG Transmission, and will be managed under Class 1.

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## 6. Consumption Adjustments

- 6.1 A Consumption Adjustment can be submitted for the following reasons;
- a. To replace the consumption recorded where the meter is on 'Bypass'
  - b. To replace the consumption recorded where there has been a confirmed theft of gas
  - c. To replace the consumption recorded where there has been a Daily Read Error
  - d. To replace the consumption recorded where there has been a fault on the asset
  - e. To correct the total consumption for a 'Twinstream Meter' Supply Point
- 6.2 The period of the consumption adjustment must align to reads recorded on UKLink
- 6.3 The total corrected consumption for the period must be submitted.
- 6.4 Users must validate the Consumption Adjustment prior to submitting to the Transporter.
- 6.5 Where a User submits a Consumption Adjustment the validations and tolerance ranges described under Section 8 will be applied.
- 6.6 Where the Consumption Adjustment fails the validations it will be rejected by the Transporter.

## 7. Validation to Site Visit Reads (Check Reads)

- 7.1 Read validation and converter tolerance checks will be applied over the 'Check Read Period'. The following will be treated as a 'Check Read' where derivable equipment is installed;
- Check Read following a Site Visit
  - Readings received as part of, or derived as a result of, an RGMA transaction.
  - Shipper transfer and Class change reading
  - Bypass reading
- 7.2 The daily average energy between the Check Read period (as defined in 7.1) will be calculated, the daily value will be used to validate against the SOQ for Class 1 and 2 and the AQ for Class 3 & 4. The SOQ/AQ will be the prevailing value for the date of the Site Visit.
- 7.3 A replacement reading will be rejected where the read date falls within the Check Read period (as defined in 7.1)
- 7.4 The 'Round the Clock' indicator should be based on the latter of either the previous Check Read, installation read, bypass reading or the transfer read.
- 7.5 Where a reading has been treated as a Check Read the reading will be used for validation purposes.

## 8. TOLERANCE RANGES

### 8.1 Tolerances Applicable to Class 1 and 2 Meter Points - Daily Reading Received Following an Actual Reading (see section 2.10 for further information on the SOQ used for the validation)

Lower AQ Band (kWh)	Upper AQ Band (kWh)	Tolerances where read will be accepted	Tolerances where a Read will be Accepted if Submitted within Override Flag (Inner Tolerance)	Outer Tolerance Where Read will be Rejected (Market Breaker)
1	1	0% - 2,000,000% of SOQ	2,000,001% - 7,000,000 % of SOQ	>= 7,000,001% of SOQ
2	200	0% - 10,000% of SOQ	10,001% - 25,000 % of SOQ	>= 25,001% of SOQ
201	500	0% - 4,000% of SOQ	4,001% - 10,000 % of SOQ	>= 10,001% of SOQ
501	1,000	0% - 2,000% of SOQ	2,001% - 5,000 % of SOQ	>= 5,001% of SOQ
1,001	5,000	0% - 400% of SOQ	401% - 2,000 % of SOQ	>= 2,001% of SOQ
5,001	10,000	0% - 200% of SOQ	201% - 500 % of SOQ	>= 501% of SOQ
10,001	20,000	0% - 150% of SOQ	151% - 400 % of SOQ	>= 401% of SOQ
20,001	73,200	0% - 300% of SOQ	301% - 600 % of SOQ	>= 601% of SOQ
73,201	732,000	0% - 250% of SOQ	251% - 550 % of SOQ	>= 551% of SOQ
732,001	2,196,000	0% - 200% of SOQ	201% - 500 % of SOQ	>= 501% of SOQ
2,196,001	29,300,000	0% - 150% of SOQ	151% - 450 % of SOQ	>= 451% of SOQ
29,300,001	58,600,000	0% - 100% of SOQ	101% - 400 % of SOQ	>= 401% of SOQ
58,600,001	and above	0% - 100% of SOQ	101% - 350 % of SOQ	>= 351% of SOQ

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**8.2 Tolerances Applicable to Class 3 and 4 Meter Points - Reading Received Following an Actual Reading (see section 2.11 for further information on the SOQ used for the validation where there is a change in Class)**

Lower AQ Band (kWh)	Upper AQ Band (kWh)	Tolerances where read will be accepted	Tolerances where a Read will be Accepted if Submitted within Override Flag (Inner Tolerance)	Outer Tolerance Where Read will be Rejected (Market Breaker)
1	1	0% - 2,000,000% of AQ/365 x no. of days	2,000,001% - 7,000,000 % of AQ/365 x no. of days	> 7,000,000% of AQ/365 x no. of days
2	100	0% - 20,000% of AQ/365 x no. of days	20,001% - 45,000 % of AQ/365 x no. of days	> 45,000% of AQ/365 x no. of days
101	200	0% - 10,000% of AQ/365 x no. of days	10,001% - 25,000% of AQ/365 x no. of days	> 25,000% of AQ/365 x no. of days
201	500	0% - 4,000% of AQ/365 x no. of days	4,001% - 55,000 % of AQ/365 x no. of days	> 55,000% of AQ/365 x no. of days
501	1,000	0% - 2,000% of AQ/365 x no. of days	2,001% - 25,000 % of AQ/365 x no. of days	> 25,000 % of AQ/365 x no. of days
1,001	5,000	0% - 400% of AQ/365 x no. of days	401% - 7,000 % of AQ/365 x no. of days	> 7,000% of AQ/365 x no. of days
5,001	10,000	0% - 200% of AQ/365 x no. of days	201% - 2,000 % of AQ/365 x no. of days	> 2,000% of AQ/365 x no. of days
10,001	20,000	0% - 150% of AQ/365 x no. of days	151% - 1,100 % of AQ/365 x no. of days	> 1,100% of AQ/365 x no. of days
20,001	73,200	0% - 300% of AQ/365 x no. of days	301% - 1,100 % of AQ/365 x no. of days	> 1,100% of AQ/365 x no. of days
73,201	732,000	0% - 250% of AQ/365 x no. of days	251% - 1,000 % of AQ/365 x no. of days	> 1,000% of AQ/365 x no. of days
732,001	2,196,000	0% - 200% of AQ/365 x no. of days	201% - 1,000% of AQ/365 x no. of days	> 1,000% of AQ/365 x no. of days
2,196,001	29,300,000	0% - 150% of AQ/365 x no. of days	151% - 700% of AQ/365 x no. of days	> 700% of AQ/365 x no. of days

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Joint Office of Gas Transporters  
 Uniform Network Code – Validation Rules

29,300,001	58,600,000	0% - 100% of AQ/365 x no. of days	101% - 400% of AQ/365 x no. of days	> 400% of AQ/365 x no. of days
58,600,001	and above	0% - 100% of AQ/365 x no. of days	101% - 350% of AQ/365 x no. of days	> 350% of AQ/365 x no. of days

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## 9. Grouping of Validations Performed

On submission of the read communication by the Shipper, the GT will perform a set of validations based on 3 groupings, in the following order:

### Set 1: Read Submission

- reading received within the read submission timescales, including the transfer reading (Opening read) and Check Read
- an actual reading cannot be replaced for Class 1 and 2 meter points

### Set 2: Asset

- all expected readings are received e.g. corrected and uncorrected reads where a Converter is recorded
- meter point status is 'Live' and asset status must not be 'Removed'
- asset serial number matches the serial number held (fuzzy match)
- reading provided must equal the number of dials and digits recorded for the asset

### Set 3: Read Validation

- Read validation tolerances
- Converter tolerance check (see section 2.7)
- for replacement readings, the date of the reading is on or after the Code Cut Off Date (Line In the Sand (LIS))
- for replacement readings, a reading exists for the same date on UKLink-
- for replacement readings, the Shipper submitting the reading was the registered Shipper on the date of the reading
- for replacement readings, the reading is not within the period of a consumption adjustment
- for replacement readings, the reading is not within the Check Read period

For each group all relevant validations within the set will be performed and rejections provided in the notification to the Shipper.

If the read submission fails the first set of validations "read submission", all relevant checks will be performed and any that fail the validations will be notified to the Shipper i.e. if there is more than one failure reason all will be communicated to the Shipper via the relevant rejection code.

Where any failures are recorded the next set of validations "Asset" will not be executed.

If the "read submission" validations pass, the second set "Asset" will be performed. All relevant checks for that set of validations will be performed and any that fail the validations will be notified to the Shipper.

Where any failures are recorded the next set of validations "Read Validation" will not be executed.

All rejections in each set of validations will be notified to the Shipper.

If both the "Read Submission" and "Asset" validations have passed the third set

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of validations “Read Validation” will be performed.  
Only where all 3 sets of validations have passed will the reading be accepted.  
Process flow included under Appendix D.

Note: Please refer to the appropriate rejection codes for the complete list of read rejections.



## APPENDIX A: 'ROUND THE CLOCK' INDICATORS

### REQUIREMENTS AND DEFINITIONS

1. The term 'Round the Clock' will be used in a single context to denote that a meter or converter has passed through all its zeros and will not necessarily imply that the meter or converter has made a complete revolution of all its dials (i.e. more than 10,000 hundred cubic feet (hcf) on a four dial meter, 100,000 hcf on a five dial meter etc).

The indicator is to be used for all meters and converters but in the remainder of the text the term meter will be used for ease of understanding.

2. This means that in the circumstance for a meter reading in hcf;

#### 2.1 Present Reading 6000

Previous Reading 5000

If the volume passing through the meter is 1,000hcf then the RTC indicator will be 0.

If the volume passing through the meter is 1 1,000hcf (because the meter has made one complete revolution of all its dials) the RTC indicator will be 1. Here the meter has gone through the zero's once.

If the volume passing through the meter is 21,000hcf (because the meter has made two complete revolutions of all its dials) the RTC indicator will be 2. Here the meter has gone through its zeros twice.

#### 2.2 Present Reading 0999

Previous Reading 9999

If the volume passing through the meter is 1,000hcf then the RTC indicator will be 1 as the meter has gone through the zero's once.

If the volume passing through the meter is 11,000hcf (because the meter has made one complete revolution of the dials) the RTC indicator will be 2 as the meter has gone through the zero's twice.

If the volume passing through the meter is 21,000hcf (because the meter has made two complete revolutions of all the dials) the RTC indicator will be 3 as the meter has gone through the zero's three times.

- NB:** A customer reading will be treated as an actual reading for the purpose of this test. The negative consumption indicator will only be used if the previous reading is an estimate.

3. The test to detect whether a meter has made more than one complete revolution of its dials will be applied only to 4 dial meters or where the previous reading is an estimate. For meters with 5 or more dials the reading will assumed to have gone forward unless the previous reading is an estimate.

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4. Where the CDSP has provided one or more consecutive estimated Meter Readings, and a subsequent actual Meter Reading is received, the read history will be assessed to determine if the last recorded actual read has a later processing date than that of the latest held estimated read. Where such a read does exist, then the consumption between the current and previous read will be calculated by the CDSP as follows, using the RTC value provided by the Shipper User:

The volume between the current actual Meter Reading and the last recorded actual Meter Reading

minus

The sum of the volume between the last recorded actual Meter Reading and the read immediately prior to the current actual Meter Reading

Where such a read does not exist (the processing date of the last recorded actual read is earlier than the processing date of the latest estimated read) then the RTC to be used by the CDSP in validation and consumption calculations will be derived as follows:

RTC value of the current actual Meter Reading

minus

The sum of the RTC value of all reads between the last recorded actual Meter Reading and the current actual Meter Reading

5. In some circumstances Meter Readings may be received from Shipper Users in an order that does not reflect that with which the Meter Readings were taken. For example, Shipper Users may, subject to other rules regarding validity of a Meter Reading, insert a Meter Reading with a reading date prior to that of the last valid Meter Reading recorded on UK Link systems. Also, Shipper Users may replace an existing Meter Reading with a reading date prior to that of the last valid Meter Reading recorded on UK Link systems.

In such circumstances, where a Meter Reading (an 'inserted Meter Reading') is provided with a Round the Clock value greater than zero the CDSP may reduce the Round the Clock associated with the Meter Reading for the subsequent reading date by one where the subsequent read already has a RTC recorded against it.

Where a Replacement Meter Reading is loaded where the Round the Clock value provided is different from the Meter Reading being replaced this may be a candidate for the CDSP to amend the RTC for the subsequent Meter Reading. For example, if the Replacement Reading RTC is greater than that associated with the Meter Reading that is being replaced, and where the subsequent read already has a RTC recorded against it the subsequent Meter

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Reading RTC value will be reduced by one.

Where an inserted or Replacement Meter Reading is received and there is a subsequent estimated read, in order to ensure any RTC value received is correctly utilised by the CDSP, the forward consumption will be calculated as follows:

The total, original, backward and forward volume  
minus

The replacement backward volume (between the replacement or inserted reading and the previous read, calculated as per point 4 if previous read is not actual)

## Appendix B: Calculated Gas Card Readings

**Note: The following is the obligation of the Users. The Transporter will not be required to carry out the following checks from readings taken from Gas Cards.**

- 1.1 The following refers to the calculation of a **Calculated Gas Card Reading** which (subject to compliance with section M5.13) can be used as an 'Opening Meter Reading' upon Supply Point Transfer.
- 1.2. Calculated Gas Card Readings will be subject to the same tests as detailed in Section 2, Cyclic Meter Readings.

### 2 **Formula**

- 2.1 The Calculated Gas Card Reading shall be calculated in the same units as the Gas Card Reading from the Gas Card and will be calculated using the following formula:

$$(((c - b) / (b - a)) * (y - x)) + y$$

where:

**a** is the Accumulative Daily Value for first date in the Applicable Sequence.  
**b** is the Accumulative Daily Value for last date in the Applicable Sequence.  
**c** is the Accumulative Daily Value for the Supply Point Registration Date.  
**x** is the First Reading in the Applicable Sequence.  
**y** is the Last Reading in the Applicable Sequence.

- 2.2 No Calculated Gas Card Reading shall be calculated where **a = b** or where **x = y**.
- 2.3 For Metric calculation (M3) the Calculated Gas Card Reading shall be in the Range 00000.10 to 99999.90. [Note: The least significant digit is always zero].
- 2.4 For Imperial calculation (Cubic Feet) the Calculated Gas Card Reading shall be in the Range 0000.01 to 9999.99.
- 2.5 The First Reading and Last Reading must be taken from a date within the six month period prior to the Supply Point Registration Date.

### 3 **Definitions**

#### 3.1 **Accumulative Daily Value**

The value used to provide a seasonal adjustment factor within the formula. Values for the relevant date within the 'Applicable Sequence' are determined using the table in Appendix C.

#### 3.2 **Applicable Sequence**

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The sequence of actual Gas Card Readings used to generate the Calculated Gas Card Reading (by execution of the formula).

- 3.3 **Calculated Gas Card Reading**  
As defined in Uniform Network Code – Transportation Principal Document Section M1.4.3(h).
- 3.4 **Gas Card Reading**  
As defined in Uniform Network Code – Transportation Principal Document Section M1.4.3(f).
- 3.5 **First Reading**  
The first of the actual Gas Card Readings taken within the six month period prior to the Supply Point Registration Date.
- 3.6 **Last Reading**  
The last of the second, third, fourth or fifth actual Gas Card Readings taken prior to the Supply Point Registration Date within the six month period prior to the Supply Point Registration Date.
- 3.7 **Supply Point Registration Date**  
As defined in Uniform Network Code – Transportation Principal Document G1.1.5

## CALCULATED GAS CARD READINGS

- 1 The following table is used to determine the 'Accumulative Daily Value' for application within the formula

**Table 4:**

Month	Date	Seasonal Factor	Seasonal Factor / 100	Accumulative Daily Value
January	01/01/04	13.80	0.138	0.138 = 0.138 + 0
	02/01/04		0.138	0.276 = 0.138 + 0.138
	03/01/04		0.138	0.414 = 0.276 + 0.138
			"	"
February	01/02/04	13.60	0.136	4.414 = 4.278 + 0.136
	02/02/04		0.136	4.55 = 4.414 + 0.136
	03/02/04		0.136	4.686 = 4.55 + 0.136
			"	"
March	01/03/04	12.20	0.122	8.344 = 8.222 + 0.122
	02/03/04		0.122	8.466 = 8.344 + 0.122
	03/03/04		0.122	8.588 = 8.466 + 0.122
			"	"
April	01/04/04	09.80	0.098	12.102
May	01/05/04	07.10	0.071	15.015
June	01/06/04	04.20	0.042	17.187
July	01/07/04	02.40	0.024	18.429
August	01/08/04	02.40	0.024	19.173
September	01/09/04	04.20	0.042	19.935
October	01/10/04	07.30	0.073	21.226
November	01/11/04	10.30	0.103	3.519
December	01/12/04	12.70	0.127	26.633
January	01/01/05	13.80	0.138	30.581
January	01/01/06	13.80	0.138	60.888
January	01/01/07	13.80	0.138	91.195
January	01/01/08	13.80	0.138	121.502

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Joint Office of Gas Transporters  
Uniform Network Code – Validation Rules

Januar y	01/01/ 09	13.80	0.138	151.945
Januar y	01/01/ 10	13.80	0.138	182.252
Januar y	01/01/ 11	13.80	0.138	212.559
Januar y	01/01/ 12	13.80	0.138	242.866
Januar y	01/01/ 13	13.80	0.138	273.309
Januar y	01/01/ 14	13.80	0.138	303.616
Januar y	01/01/ 15	13.80	0.138	333.923
Januar y	01/01/ 16	13.80	0.138	364.230
Januar y	01/01/ 17	13.80	0.138	394.673
Januar y	01/01/ 18	13.80	0.138	424.980
Januar y	01/01/ 19	13.80	0.138	455.287
Januar y	01/01/ 20	13.80	0.138	485.594
Januar y	01/01/ 21	13.80	0.138	516.037
Januar y	01/01/ 22	13.80	0.138	546.344
Januar y	01/01/ 23	13.80	0.138	576.651
Januar y	01/01/ 24	13.80	0.138	606.958

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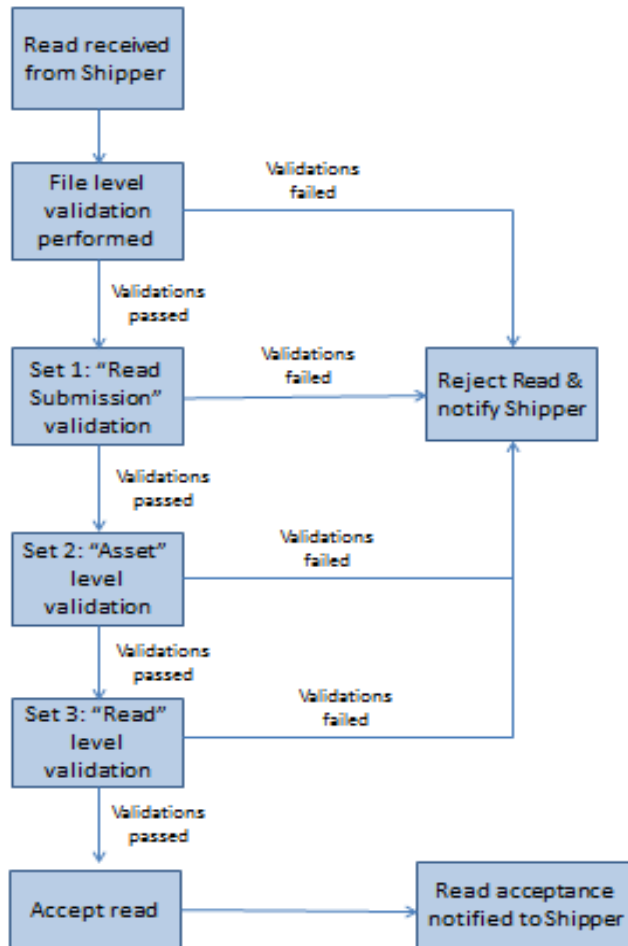
## Appendix C: Meter Reading Agency HHT (On Site) Validation

**Note: The following is the obligation of the Users. The Transporter will not be required to carry out the following checks.**

- 1 Validation for this input will be performed at the time of data capture on the HHT.
- 2 The Meter Reading will be checked to ensure that it is within a specified range either side of an estimated reading. This is known as an Inner Tolerance Range (ITR). The estimated reading will be calculated using the consumption history and the AQ of the meter.
- 3 If the Meter Reading input is outside the ITR, the meter reader will be required to re-input the meter serial number. If this number is that on the HHT (the correct meter) then they will be required to re-input the reading. This confirms the accuracy of the first reading or corrects an error on the first attempted input. If the meter number differs a meter exchange will be initiated. Similar checks are to be performed on converter readings.
- 4 A check will be made on the number of digits for a Meter Reading i.e. six digits must be input for a six dial meter. No alteration to the number of dials can be made on the HHT. Any anomalies discovered will be reported as they generally signify meter exchanges.



## Appendix D: Read Validation Process Flow



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## **Appendix E: Assessment of Meter Readings where the CDSP is not assessing all Meter Readings submitted as to whether they are valid**

- 1 Following implementation of UNC Modification 0700 the CDSP is required to select a minimum of one Non Opening Meter Reading in a seven Day Batch Period for Class 3 Supply Meters on Smaller Supply Points to assess whether it is a Valid Meter Reading and therefore shall be subject to the [CDSP] element of validation described above.
- 2 Any Valid Meter Readings shall be used for Offtake Reconciliation.
- 3 Any Meter Readings that are not subject to this processing will need to be assessed for the purposes of Meter Reading performance as described in M 5.8.5.
- 4 The CDSP shall:
  - 4.1 Select one Non Opening Meter Reading submitted from the Batch Period – as defined in M5.8, taking account as necessary of the User specified date. This Meter Reading will be subject to Validation.
  - 4.2 If this Meter Reading successfully passes this Validation, this Meter Reading will be considered Valid, and the remaining Non Opening Meter Readings submitted by the User will be considered valid for the purposes of Meter Reading performance.
  - 4.3 If this Meter Reading does not successfully pass this Validation, this Meter Reading will not be considered Valid, and a further Meter Reading selected by the CDSP within the Batch Period. If this second Meter Reading successfully passes this Validation, this Meter Reading will be considered Valid, and the remaining Non Opening Meter Readings (but not the initially validated Meter Reading as described in 4.1) submitted by the User will be considered valid for the purposes of Meter Reading performance.
  - 4.4 If this second Meter Reading fails Validation, this Meter Reading will not be considered Valid and no further Meter Readings will be subject to Validation. All remaining Non Opening Meter Readings within the Batch Period shall not be considered valid for the purposes of Meter Reading performance.

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## Representation - Draft Modification Report UNC 0811S Shipper Agreed Read (SAR) exceptions process

Responses invited by: **5pm on 10 January 2023**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Oorlagh Chapman
<b>Organisation:</b>	Centrica
<b>Date of Representation:</b>	09/01/2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable* <i>delete as appropriate</i>

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

This modification will provide a simple but essential exceptions process to ensure agreed reads that have not been actioned are updated in required timeframes.

**Self-Governance Statement: Please provide your views on the self-governance statement.**

Support the process as self-governance.

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

As soon as practicable

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

None identified

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

Yes

**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.*

None identified

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

N/a

## Representation - Draft Modification Report UNC 0811S Shipper Agreed Read (SAR) exceptions process

Responses invited by: **5pm on 10 January 2023**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Claire Louise Roberts
<b>Organisation:</b>	ScottishPower
<b>Date of Representation:</b>	11 January 2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

ScottishPower is in support of implementation of this modification as it seeks to address issues with the current SAR process for gas.

### Self-Governance Statement: Please provide your views on the self-governance statement.

We agree with the self-governance statement.

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

We would be required to make some system changes as a result of this modification and for that reason a minimum of 6 months lead time would be required.

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

As stated above some system changes would be needed but this is yet to be impact accessed at this stage.

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

Yes

**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.*

Non identified

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

## SEFE Energy Representation Draft Modification Report

### Modification 0811S - Shipper Agreed Read (SAR) exceptions process

1. **Consultation close out date:** 10<sup>th</sup> January 2023
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:**  
SEFE Energy  
5<sup>th</sup> Floor  
8 First Street  
Manchester  
M15 4RP
4. **Representative:**  
Steve Mulinganie  
Regulation Manager  
[stevemulinganie@sefe-energy.com](mailto:stevemulinganie@sefe-energy.com)  
0799 097 2568
5. **Date of Representation:** 30<sup>th</sup> December 2022
6. **Do you support or oppose Implementation:**  
We **Support** implementation of the Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
The current process does not provide a remedy should a party fail to act in accordance with the existing process. We raised this modification to introduce an exceptions process that addresses these circumstances.
8. **Are there any new or additional Issues for the Modification Report:**  
**No**
9. **Self-Governance Statement Do you agree with the status?**  
**Yes** - as this is an exceptions process
10. **Relevant Objectives:**  
*How would implementation of this modification impact the relevant objectives?*  
We raised the Modification, and we believe the Modification furthers Relevant Objective d) Securing of effective competition: (i) between relevant shippers and (ii) between relevant suppliers as it provides an exception process to ensure that energy is correctly reconciled between parties.

We note that **no Workgroup Participants raised any objections** to the argument put forward above.

We believe the Modification is also positive in relation to relevant objective f) Promotion of efficiency in the implementation and administration of the Code as currently some Shipper Agreed Reads are not being actioned in a timely and efficient manner and this proposal will address those situations by providing a suitable remedy.

We also note some Workgroup Participants agreed as this could enable settlement to work faster, this Modification could also help to improve Shipper's read performance (once initial reads are accepted, other reads can flow in behind).

We note again that **no Workgroup Participants raised any objections** to the argument put forward above

#### 11. Impacts & Costs:

*What analysis, development and on-going costs would you face if this modification was implemented?*

We **have not** identified any significant costs associated with the implementation of this modification

#### 12. Implementation:

*What lead times would you wish to see prior to this modification being implemented, and why?*

We note the Workgroup discussions around implementation and in particular the consequential system changes impacting the CDSP which mean it would be best aligned with a Major System Release. Taking into account this constraint we would be looking at this being delivered as soon as reasonably practicable.

#### 13. Legal Text:

*Are you satisfied that the legal text will deliver the intent of the modification?*

We have reviewed the Legal Text provided and have no further comments

#### 14. Is there anything further you wish to be taken into account?

*Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.*

**No**



## Representation - Draft Modification Report UNC 0811S

### Shipper Agreed Read (SAR) exceptions process

**Responses invited by: 5pm on 10 January 2023**

**To:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	David Mitchell
<b>Organisation:</b>	Scotland Gas Networks Ltd & Southern Gas Networks Ltd
<b>Date of Representation:</b>	10/01/23
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable* <i>delete as appropriate</i>

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

SGN supports this modification as it will provide a means for Shipper Agreed Reads to be updated by the Central Data Services Provider if the Shipper fails to update the read. If this modification is implemented it will help to improve the information held in the central systems and should therefore increase the accuracy of the settlements process thus furthering relevant objectives (d) and (f).

#### Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree with the self-governance statement as this is a non-material change.

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

We are mindful that this change will need to align to the necessary changes to the central systems being made which isn't likely to take place until November 2023, therefore we would expect that the implementation would align to this piece of work being completed.

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

No costs or impacts to SGN are envisaged.

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

We are satisfied with the legal text.

**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.*

None identified.

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

We don't have any further comments.

## Representation - Draft Modification Report UNC 0811S Shipper Agreed Read (SAR) exceptions process

Responses invited by: **5pm on 10 January 2023**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Mark Jones
<b>Organisation:</b>	SSE Energy Supply Limited
<b>Date of Representation:</b>	10 January 2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

We agree with the proposer that some shippers do not submit replacement reads nor raise RFAs, which can lead to both imbalances for other shippers and future read issues for incoming suppliers if the transfer reads are not corrected, and that this modification will allow SARs that have not been progressed within a reasonable period to be managed by the CDSP.

### Self-Governance Statement: Please provide your views on the self-governance statement.

We agree that the modification meets the self-governance criteria.

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

The modification should be implemented as soon as possible in line with the self-governance criteria.

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

No significant costs identified.

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

Yes.

**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.*

No.

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