# **UNC Modification**

At what stage is this document in the process?

Workgroup Report

**Draft Modification** 

**Final Modification** 

Report

Report

01

02

03

04

# UNC 0816S:

# Update to AQ Correction Processes

#### **Purpose of Modification:**

This Modification proposes to add two further '**eligible causes**' to the Annual Quantity (AQ) amendment process within TPD G2.3.21 and to prevent AQ amendments being processed where there is no change in value to the AQ.

#### Next Steps:

The Proposer recommends that this Modification should be:

- subject to Self-Governance
- assessed by a Workgroup

This Modification will be presented by the Proposer to the Panel on 16 February 2023. The Panel will consider the Proposer's recommendation and determine the appropriate route.

#### **Impacted Parties:**

Medium: Shippers, Distribution Network Operators, CDSP

#### Impacted Codes:

None identified at this stage.

# Joint Office of Gas Transporters

Сс	ontents			Any questions?
1 2 3 4 5 6 7 8 9	Summary Governance Why Change? Code Specific Matters Solution Impacts & Other Considerations Relevant Objectives Implementation Legal Text		3 4 4 5 6 7 7	Contact: Joint Office of Gas Transporters enquiries@gasgovernan ce.co.uk 0121 288 2107 Proposer: Clare Manning – EON
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Wo Dra	at Workgroup Meeting rkgroup Report to be presented to Panel aft Modification Report issued for consultation insultation Close-out for representations	25 August 2022 18 May2023 19 May 2023 9 June 2023		<b>W</b> david.mitchell@sgn.co. uk
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# 1 Summary

#### What

At present, the Uniform Network Code (UNC) currently allows for the amendment of a Supply Point Annual Quantity (AQ) due to four eligible causes defined within <u>TPD G2.3.21</u>. The current eligible causes for amending an AQ are theft of gas, change in consumer plant, commencement of new business or discontinuance of an existing business activity and tolerance change.

This Modification seeks to add two further eligible causes, which are Erroneous AQ based on read history and Change in operation and/or use.

The eligible cause Erroneous AQ based on read history is intended to be utilised where a Supply Meter Point (SMP) has a read history outside of the current Registered User's ownership which is not representative of the current usage of the SMP, the User may utilise an Erroneous AQ based on read history AQ Correction.

The eligible cause Change in operation and/or use is intended to be utilised where a SMP has changed in use resulting in a need for an increase or decrease in AQ, where there is no physical change of equipment or change of Shipper.

This Modification also seeks to prevent AQ amendments where there is only a de minimis change being made to the current AQ value.

#### Why

The <u>0783R – Review of AQ Correction Processes</u> was required in order to assess whether the current arrangements meet the objectives for the setting of the AQ and identify and consider possible amendments that are required to UNC. During the 0783R – Review of AQ Corrections Processes discussions, Distribution Workgroup looked at summary data of how current eligible causes are used, and whether the current eligible causes for utilising an AQ amendment are fit for purpose.

It was identified that two further eligible causes are necessary for Users to utilise in order to submit AQ corrections. It was felt that this would also improve the overall accuracy in use of the AQ corrections process.

#### How

TPD Section G 2.3.21 will be amended to include the two further eligible causes, Erroneous AQ based on read history and Change in operation and/or use.

A change will also be required in order to prevent AQ corrections where there is a de minimis change being made to the current AQ value.

#### 2 Governance

#### **Justification for Self-Governance**

The Modification is suitable for Self-Governance as it is unlikely to have a material effect on "(*bb*) competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes", due to simply updating existing AQ correction processes.

#### **Requested Next Steps**

This Modification should:

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

# 3 Why Change?

There are provisions within UNC for a User to make amendments to any of its registered Supply Point AQs where it believes that the AQ is not representative of its consumption over the following 12-month period. UNC outlines Eligible causes which a User can rely on when making such an AQ amendment.

Following the outcome of the Review Group <u>0783R</u> - <u>Review of AQ Correction Processes</u>, two further eligible causes were identified as being necessary for Users in order to ensure that all eligible causes within Code are fit for purpose. The Review also identified a portion of AQ corrections being submitted which give no change to the AQ value. Participants of the Review therefore felt that it was necessary no longer allow such AQ amendments where there is a de minimis change.

As these are the outcomes from the Review Group, these are aspects of the AQ corrections process where currently the process is not providing the full scope of eligible causes a User may require in order to submit an AQ amendment. By applying these changes which have been identified, the aim is to ensure that the AQ corrections process is fully fit for purpose.

As with the existing eligible causes, utilisation of these new causes has no adverse impact on the previous Shipper as it is used only as a corrective action for the current User.

### 4 Code Specific Matters

#### **Reference Documents**

<u>Uniform Network Code - Transportation Principal Document - Section G - Supply Points - 2.3.21</u> 0783R - Review of AQ Correction Processes

#### Knowledge/Skills

Nothing specific.

# 5 Solution

#### **Business Rules:**

BR1: A change is required to UNC TPD G2.3.21 to add two further eligible causes, Erroneous AQ based on read history and Change in operation and/or use, and to prevent AQ corrections where there is a de-minimis change in value for AQ for all eligible causes.<sup>+</sup>, with the exception of eligible cause 4 (TPD G2.3.22).

BR2: Erroneous AQ based on read history - Where a Registered User reasonably believes, in its sole discretion, that a Supply Meter Point (SMP) has a read history outside of the current Registered User's ownership which is not representative of the current usage of the SMP, the User may utilise the eligible cause Erroneous AQ based on read history AQ correction.

, The following criteria must be met:

- The Supply Point Registration Date with the current shipper must be within 12 months of the date of the request, and
- The site's Annual Quantity must have increased by greater than 100% since the current shipper's Supply Point Registration Date.
- The cause must have occurred on or after the AQ Read Date of the AQ Opening Reading used in the most recent calculation of the Annual Quantity

BR3: Change in operation and/or use - Where a SMP has changed in use resulting in a need for an increase or decrease in AQThe following criteria must also be met:

- the site must not be vacant
- there has been no physical change of equipment
- there has been no commencement of a new business activity or discontinuance of an existing

business activity at the consumer's premises;

• there has been a material change in business operation at the site so that the current Annual Quantity is no longer reflective of the estimated future annual usage.

BR4: Utilising any AQ correction to submit a value which is less than 5% different to the current AQ will not be allowed and the User will receive a rejection response.<sup>1</sup> with the exception of Eligible cause 4 (TPD G2.3.22).

Guidance note - for the avoidance of doubt BR4 is only intended to apply to the eligible causes (both existing and the new ones created by this modification) and not to a request to change the AQ under TPD G2.3.22

Guidance Note (General) - For the avoidance of doubt, as with the eligible causes already within the UNC, when submitting a request for either (i) AQ correction based on change in operation or use, or (ii) AQ correction based on read history, the requesting User must submit evidence to the CDSP of the eligible cause's legitimate application and the satisfaction of any conditions of application pertinent to that eligible cause, following the provisions of TPD G2.3.24(a)(ii)(1)

# 6 Impacts & Other Considerations

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

No impact identified.

#### **Consumer Impacts**

The inclusion of two additional eligible causes will ensure that Users are provided with the necessary ways to submit AQ amendments more accurately. Whilst this does not directly impact consumers, this may have further downstream effects to consumers, ensuring that they are billed more accurately.

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

No impact identified.

pact 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	None	
Benefits for society as a whole	None	

#### **Cross-Code Impacts**

No cross-code impacts identified as the IGT points over to the UNC

#### EU Code Impacts

None identified.

#### **Central Systems Impacts**

It is expected that there will be Central System impacts, the impact of the Modification Solution on Central Systems will need to be assessed.

## 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	None
	(i) the combined pipe-line system, and/ or	
	(ii) the pipe-line system of one or more other relevant gas transporters.	
c)	Efficient discharge of the licensee's obligations.	None
d)	Securing of effective competition:	Positive
	(i) between relevant shippers;	
	(ii) between relevant suppliers; and/or	
	(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	
e)	Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers.	None
f)	Promotion of efficiency in the implementation and administration of the Code.	Positive
g)	Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

The Modification furthers relevant objective d) Securing of effective competition, as it ensures that there is suitable process available for Users to correct AQs and ensure that they are an accurate reflection of consumption.

The Modification is also positive in relation to relevant objective f) Promotion of efficiency in the implementation and administration of the Code as it allows Users to utilise the appropriate eligible cause in order to amend an AQ.

### 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.

# 9 Legal Text

#### **Text Commentary**

твс

# Joint Office of Gas Transporters

#### Text

твс

# **10 Recommendations**

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

Panel is asked to:

- Agree that Self-Governance procedures should apply.
- Refer this proposal to a Workgroup for assessment