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UNC F	At what stage is this document in the process?			
UNC 0620S: Deferral of the UK Link Manual delivery date (further revision)				
Purpose of Modification: This UNC Modification is necessary to further revise the delivery date for a new and revised UK Link Manual (a CDSP Service Document) within the UK-Link Framework Document being part of the Data Services Contract (DSC).				
	The Panel determined that this self-governance modification be implemented.			
0	High Impact: None			
0	Medium Impact: None			
0	Low Impact: Central Data Service Provider, Transporters (including iGTs), Shi	ppers.		

? Contents Any questions? 1 Summary 3 Contact: Joint Office of Gas 3 2 **Governance Summary Transporters** 3 Why Change? 3 20 4 **Code Specific Matters** 4 enquiries@gasgove rnance.co.uk 5 Solution 4 **Impacts & Other Considerations** 4 6 0121 288 2107 7 **Relevant Objectives** 5 Proposer: **Chris Warner** 5 8 Implementation 20 9 Legal Text 6 chris.warner@cade **10 Consultation** 6 ntgas.com **11 Panel Discussions** 8 07778 150668 **12 Recommendations** 8 Transporter: Cadent Timetable Systems Provider: Xoserve 0 Modification timetable: commercial.enquiri Draft Modification Report issued for consultation 15 June 2017 es@xoserve.com Consultation close-out for representations 04 July 2017 Final Modification Report available for Panel 05 July 2017 Modification Panel decision 07 July 2017

1 Summary

What

This proposal seeks to further defer the delivery date of the amendments to the UK Link Manual as required in the UK Link Framework Document.

Why

National Grid Gas Distribution Limited (NGGD), now Cadent raised UNC Modification Proposal 0613S 'Revised UK Link Manual CDSP Data Services Document' to expedite the implementation of a new and revised UK Link Manual document from 1st June 2017. UNC Modification Proposal 0617S 'Revised UK Link Manual delivery date' was subsequently implemented which changed the above date to 31st July 2017.

It has since been identified that a further deferral of the implementation date to 13th October 2017 is necessary to provide sufficient time for the significant volume of changes to the Manual to be comprehensively reviewed by industry parties.

How

The UK-Link Manual Framework Document will be updated to reflect a new UK-Link Manual 'delivery' date being 13th October 2017.

2 Governance Summary

Justification for Self-Governance

Panel determined the modification is unlikely to have a material effect on any of the self-governance criteria because it only seeks to amend the date for delivery of a new and revised UK Link Manual under the DSC.

Modification 0620S will therefore follow self-governance procedures.

Requested Next Steps

This Modification should:

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

3 Why Change?

The UK Link Manual Framework Document, (implemented by Modification 0565A Central Data Service Provider – General framework and obligations) see paragraph 1.5.4 in the following link <u>http://www.gasgovernance.co.uk/UK Link Manual Framework Document.pdf</u> explains that prior to the PNID (01 June 2017), a revision of the UK Link Manual will be required in the context of the Nexus Modifications and it is intended that, as part of such revision, the different component parts of the UK Link Manual will be consolidated into a new and revised UK Link Manual. National Grid Gas Distribution Limited (NGGD), now Cadent raised UNC Modification Proposal 0613S 'Revised UK Link Manual CDSP Data Services Document' to expedite the implementation of a new and revised UK Link Manual document.

NGGD subsequently raised UNC Modification Proposal 0617S 'Revised UK Link Manual delivery date' which sought to defer the above date to 31st July 2017. This was to permit additional time to ensure that the manual was as accurate as possible. Modification 0617S will be implemented effective from 1st June 2017.

Subsequent to this, following receipt of legal advice and discussion within the UNC Distribution Workgroup it has been identified that further time, over and above that facilitated by Modification 0617S, is necessary to permit a full and in-depth review by industry parties of the significant volume of changes identified by the CDSP. It is intended that the review will be conducted in both a UNC Workgroup and the DSC Contract Management Committee depending on the subject matter of each component document.

4 Code Specific Matters

Reference Documents

CDSP Service Document – UK Link Manual

Knowledge/Skills

No specific knowledge or skills are necessary.

5 Solution

Modification of the DSC is proposed to reflect a revised implementation timescale for a revised UK-Link Manual within the UK Link Manual Framework Document, being 13th October 2017.

6 Impacts & Other Considerations

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

Neither the SCR nor any significant industry change project is impacted.

Consumer Impacts

No consumer impacts are identified. The UK Link Manual is solely concerned with systems and process interactions between UNC parties.

Cross Code Impacts

No cross-code impacts have been identified.

EU Code Impacts

No EU Code impacts identified.

Central Systems Impacts

No central system impacts have been identified as the UK Link Manual documents existing processes established by Project Nexus.

7 Relevant Objectives

Im	pact of the modification on the Relevant Objectives:				
Re	elevant Objective	Identified impact			
a)	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:	None			
	(i) between relevant shippers;				
	(ii) between relevant suppliers; and/or				
	(iii) between DN operators (who have entered into transportation				
	arrangements with other relevant gas transporters) and relevant shippers.				
e)		None			
	secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers.				
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			

This Modification seeks to ensure that an 'enduring' UK-Link Manual can be implemented in a reasonable time following implementation of Project Nexus. The additional time allowed would enable industry parties to conduct a full and thorough review of the complex and extensive set of changes required for much of the Manual content. This could be expected to facilitate GT Licence relevant objective f) 'Promotion of efficiency in the implementation and administration of the Code'.

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

Modification 0620 makes a further amendment to the date for completion of a post-Nexus version of the UK Link Manual, following modification 0617S.

Data Services Contract			
UK Link Manual Framework Agreement			
Ref.	Торіс	BRDs	Explanation
1.5.4(c)	Date for completion of revised UK Link Manual	-	Paragraph amended to make clear revised and consolidated UK Link Manual will be completed by 13 October 2017 and will replace the existing UK Link Manual with effect from a later date to be determined pursuant to a further Code Modification.

Text

DATA SERVICES CONTRACT - UK LINK MANUAL FRAMEWORK AGREEMENT

Amend paragraph 1.5.4(c) to read as follows:

1.5.4

(c) the revised UK Link Manual will be completed by 13 October 2017, and it will be given effect (and replace the Existing UK Link Manual) on such date as is determined pursuant to Code Modification.

10 Consultation

Panel invited representations from interested parties on 15 June 2017. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Implementation was unanimously supported in the 6 representations received.

Trepresentations were received norm the following parties.			
Organisation	Response	Relevant Objectives	Key Points
Cadent	Support	f - positive	 Concurs with the statement in the Draft Modification Report that the additional time allowed would enable industry parties to conduct a full and thorough review of the complex and extensive set of changes required for much of the UK-Link Manual content. Agrees with the justification statement within the Draft Modification Report that this modification only seeks to amend the date for delivery of a new and revised UK

Representations were received from the following parties:

			 Link Manual under the Data Services Contract (DSC) and therefore has no material impact on any of the self- governance criteria. Cadent Gas is satisfied that the legal drafting and supporting text commentary contained within the Draft Modification Report meets the requirements and intent of the Modification.
Centrica	Support	f-positive	 The importance of ensuring the UK Link Manual documentation is correct should be more important that setting an arbitrary date by which the work is complete. Therefore, we support arrangements which extend the UK Link development period and the related implementation date. This change does not introduce new arrangements, but seeks to amend a date in Code. This does not have a likely material impact to competition or consumers, so self- governance is appropriate.
Northern Gas Networks	Support	f-positive	 Supports this modification as it extends the due date for the release of the revised UK Link Manual, and allows more time for the industry to develop and appropriately review the proposed changes. Agrees that this modification meets the self-governance criteria. NGN does not foresee any additional impacts or costs by extending the release date.
SGN	Support	f-positive	 Supports Modification 0620S as it extends the deadline for delivery of the revised UK Link Manual and provides more time for industry parties to comprehensively review the significant volume of changes. Agrees with self-governance status as this modification is unlikely to materially impact the self-governance criteria. Does not believe there are any material impacts in extending the deadline for delivery of the revised manual and are keen to ensure the document is comprehensively reviewed and agreed by industry parties and is of adequate quality.
Wales & West	Support	f-positive	 Supports this proposal as it will enable an appropriate length of time for scrutiny of the new UK Link Manual and therefore supports relevant objective f. Agrees that this satisfies the self-governance criteria.

Npower Support f-positive	 It would be preferable to have the UK Link manual delivered at a later date if the finished product is of a higher quality. Support the UK Link manual delivery date of 13th October 2017. Agrees that this modification should follow self-governance procedures.
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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 Modification 0620S would further defer the delivery date (to 13 October 2017) for the revised UK Link Manual as required in the UK Link Framework Document. This would allow additional time for the Central Data Services Provider (CDSP) to correctly reflect the Project Nexus changes.

Members considered the representations made noting that implementation was unanimously supported in the 6 representations received.

Members agreed with respondents and the Proposer that the additional time this modification proposes was desirable as it would enable the CDSP to produce a higher quality product than would otherwise be the case should the prevailing timescale be adhered to.

Consideration of the Relevant Objectives

Members considered relevant objective f) *Promotion of efficiency in the implementation and administration of the Code*, agreeing that implementation would have a positive impact because a highquality UK Link Manual would better serve industry needs in the future.

Determinations

Members voted unanimously to implement Modification 0620S.

12 Recommendations

Panel Determination

Members agreed that Modification 0620S should be implemented.