

Stage 02: Workgroup Report

iGT082:

Non-effective Days for Cutover to Single Service Provision in 2016

At what stage is this document in the process?

- 01 Modification Proposal
- 02 Workgroup Report
- 03 Draft Modification Report
- 04 Final Modification Report



This modification creates seven non-effective Days from 24th September 2016 to 30th September 2016 inclusive, to enable data preparation and cutover to the arrangements created by iGT039 - Use of a single Gas Transporter agency for the common services and systems and processes required by the iGT UNC. The proposal seeks to replace iGT072 which originally anticipated iGT039 being implemented on October 1st 2015.



Work Group recommends iGT082 proceeds to consultation



High Impact:
Pipeline Operators, Pipeline Users



Medium Impact:



Low Impact:

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About this document:

The purpose of this report is make a recommendation to the Panel, to be held on 16th December 2015, on whether iGT082 should proceed to consultation and to submit any further recommendations in respect of the assessment of this Modification.



Any questions?

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The following timetable is recommended:

Initial consideration by Workgroup	3 rd November 2015
Amended Modification considered by Workgroup	1 st December 2015
Workgroup Report presented to Panel	16 th December 2015
Draft Modification Report issued for consultation	16 th December 2015
Consultation Close-out for representations	13 th January 2016
Final Modification Report published for Panel	14 th January 2016
iGT UNC Modification Panel decision	20 th January 2016

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1. Plain English Summary

Is this a Self-Governance Modification?

The Workgroup recommend that this **is not** a self-governance Modification.

If so, will this be progressed as a Fast Track Modification?

The Workgroup recommend that this **will not** be progressed as a Fast Track Modification.

Rationale for Change

To cutover to the iGT agency services model created by iGT039 - Use of a single Gas Transporter agency for the common services and systems and processes required by the iGT UNC, a period of time is required to prepare and migrate data. This requires a number of non-effective days during which files to update and maintain the Supply Point Register and for supply point administration activities cannot be submitted.

Solution

The solution is to create seven days as Non-Effective Days (see definition later) as days on which certain transactions may not be made. The seven days are September 24th 2016 to September 30th 2016.

Relevant Objectives

This modification supports Objective C Efficient discharge of the licensee's obligations, in that it will create the arrangements to implement modification 039.

It is expected that this modification will also support Objective F; the promotion of efficiency in the implementation and administration of the network code as it will overwrite the requirements of the deferred IGT072 modification, the requirements of which are no longer fit for purpose.

Implementation

This modification can be implemented immediately following Ofgem approval, to provide early formal notice of the requirements for non-effective days.

2. Rationale for Change?

To cutover to the iGT agency services model created by iGT039 - Use of a single Gas Transporter agency for the common services and systems and processes required by the iGT UNC, a period of time is required to prepare and migrate data. This requires a number of non-effective days during which files to update and maintain the Supply Point Register and for supply point administration activities cannot be submitted.

The workgroup acknowledged that iGT072 had been indefinitely deferred by Ofgem and that it would in effect not be implemented. The group agreed that IGT082 would in effect replace the iGT072 obligations albeit that the iGT082 arrangements were designed to support project NEXUS implementation on 1st October 2016.

Workgroup discussions which were held on the 3rd November 2015 and the 1st December 2015 focused on 2 main areas

- 1) The requirement for seven non-effective days
- 2) What is required from which party during the non-effective period.

In terms of the requirement for seven non effective days as opposed to six, it was noted that Project NEXUS would be implemented on a Saturday with the revised implementation date being 1st October 2016 rather than 1st October 2015. The group acknowledged that in the UNC discussions under UNC0532 it had been agreed that seven non-effective days were required and that there was a desire for IGT and GDN non effective processes to align to ensure cross-code consistency and uniformity of messaging to consumers. It was also noted that retaining 6 non effective days under iGT082 would require parties to operate their systems on non-working days, effectively treating the weekend of the 24th and 25th September as normal business days. This was outlined in the second work group meeting in a presentation pack provided by the Agency which can be found [here](#).

In terms of agreeing what is required from which party during the non-effective period, the group developed a supporting report for IGT082 outlining the requirements which was largely based on that originally drafted under IGT072. The 082 supporting report can be found [here](#). Though this has been competed as much is currently deemed necessary, the group agreed that this document would be organic and should there be any changes to the requirements for the non-effective period, the report will be updated accordingly. The group agreed that the intent of the modification was to introduce the concept of non-effective days into the IGT UNC and the supporting report though referenced does not form part of the legal text itself.

3. Solution

Though greater detail has been developed for the modification proposal, the final solution remains unchanged to that in the original proposal – to have a period of seven days termed Non-Effective Days on which certain communications may not be made. The seven days are September 24th 2016 to September 30th 2016 which are referenced in the legal drafting as Project NEXUS Implementation Date “PNID” (which is defined as 1st October 2016) and specific days then denoted using PNID-1, PNID-2 etc. A full list of impacted areas has been developed and reviewed by the work group and can be found below using the defined terms from the IGT UNC:

Agreed Opening Meter Reading;
C&D Information;
C&D Notification;
Capacity Revision Application;
Daily Meter Readings;
Emergency Contacts
Meter Fix Reading;
Meter Fit Report;
Meter Information Notification;
Meter Information Update Notification;
Meter Read;
Opening Meter Reading;
Proposing User's Estimate;
Proposing User Read;
Revised Meter Reading.
Supply Point Confirmation;
Supply Point Confirmation Cancellation;
Supply Point First Nomination;
Supply Point Nomination;
Supply Point Objection;
Supply Point Offer;
Supply Point Reconfirmation;
Supply Point Registration;
Supply Point Registration Date;
Supply Point Registration Number;
Supply Point Renomination;
Supply Point Second Nomination;
Supply Point Withdrawal;
Threshold Rate Increase.

Work group members have agreed that any communications listed above must be sent to the Pipeline Operator before 17:00 hours on PNID-8 and all Pipeline Operator responses to communications received on PNID-8 or PNID-7 must be responded to by no later than PNID-7.

To aid with the migration of data, IGTs have agreed to provide Shippers with a one off portfolio extract at the beginning of the non-effective period to allow Shippers to cross reference the data held within their systems to that held by both IGTs and the Agency.

It was raised during the work groups that parties will need to be aware of the status of each transaction at the beginning of the Non-Effective period. Parties acknowledged that this isn't in scope of the proposal but a solution will be developed under the Shipper work stream meetings and a modification raised to facilitate.

As this modification is effectively a transition modification to facilitate Agency services, the group agreed that the legal text will be implemented following Ofgem approval in

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order that the requirements are in place as soon as possible. The IGT082 legal text will then be overwritten by that of IGT039 on October 1st 2016 which will coincide with the implementation of Agency services.

A full list of questions which were raised during IGT072 can be found on the 072 section of the IGT UNC website. The work group requested clarification of the need for 7 non-effective days under IGT082 and the supporting presentation on this can be found [here](#).

A timeline of events for the Non-Effective Period and how the various events fit around this period can be found in the IGT082 modification itself. This has been reviewed and developed by the work group.

A separate report accompanying IGT082 providing additional detail can be found [here](#).

4. Relevant Objectives

Impact of the modification on the 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.	Positive
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.	None
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.	Potentially Negative

The Workgroup considers that this Modification would facilitate:

Objective C)

The work group agrees that this proposal would better facilitate objective c "Efficient discharge of the licensee's obligations" on the basis that IGTs have a licence obligation to have Agency services in place on October 1st and that the modification is deemed necessary to successfully implement such arrangements.

Objective F)

The proposal will also better facilitate objective f) as will replace the IGT072 provisions for non-effective days that were drafted on the basis of Project NEXUs being implemented on 1st October 2015.

The group noted that Shippers' concerns that Objective (g) may be negatively impacted on the basis that Shipper parties may not be able to facilitate faster switching in a number of cases. These concerns also formed part of IGT072 though it is acknowledged that Shippers had sought comfort from Ofgem on the required non-effective period.

5. Impacts and Costs

It is anticipated that both Shippers and IGTs will incur costs as a result of this proposal by having to restrain their respective systems from sending communications during the non-effective period. It was agreed that it would be very difficult to identify costs specific to IGT082 as these would be incorporated within the general SSP systems changes under IGT039. Costs to implement IGT039 can be found within the [IGT039 work group report](#).

6. Likely Impact on Consumers

For clarity, Shipper confirmations will take effect on days included in the non-effective period. Shippers have raised concerns however that the non-effective period in some instances will impact the 21 day switching requirement under "faster switching". Shippers have under IGT072 requested confirmation from Ofgem that they will not be subject to any penalties as a result of the non-effective period which may put them in breach of the faster switching requirements. It was also acknowledged under the [7 non effective day presentation](#) that there should not be a material impact in terms of extra customers impacted under IGT082.

7. Likely Impact on Environment

It is not anticipated that this modification will have an impact on the environment.

8. Implementation

As this modification is effectively a transition modification to facilitate Agency services, the group agreed that the legal text will be implemented following Ofgem approval in order that the requirements are in place as soon as possible. IGT072 has been deferred indefinitely by Ofgem so the legal text of IGT082 will be implemented as a standalone set of text which will replace the text that was planned to be implemented by IGT072. Subsequently, the IGT082 legal text will be overwritten by that of IGT039 on October 1st 2016 which will coincide with the implementation of Agency services.

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9. Legal Text

The work group have reviewed and developed the legal with the final version being as follows:

Sub section introductory text:

The following provisions of Part [CI] are subject to the Non-Effective Day requirements as set out in Part N.

- To be included at beginning of CI, CII, CIV, CV, D, E, I.

Part N

1.1. In order to enable changes to be performed in respect of iGT Agency Services as set out in IGT039 Use of a Single Gas Transporter Agency for the common services and systems and processes required by the IGT UNC (directed by the Authority on the 11/03/2015) and UNC modification UNC0440 Project Nexus – iGT Single Service Provision (directed by the Authority on the 14th January 2015) , there will be a period of Non-Effective Days during which no updates to the Supply Point Register can be made by the Pipeline Operator. The requirements for Non-Effective Days are set out in the [IGT082 supporting report](#).

1.2. For the purposes of paragraph 1.1 a “**Non-Effective Day**” shall be any of the following Days, PNID-7 up to and including PNID-1.

1.3. For the avoidance of doubt, a Proposed Supply Point Registration Date may be a Non-Effective Day.

1.4. Subject to paragraph 1.6 any communication as set out under paragraph 1.7 may not be submitted on any Non-Effective Day.

1.5. Any of the communications listed in paragraph 1.7 which are sent by a Pipeline User to a Pipeline Operator on PNID-8 must be received by the Pipeline Operator before 17:00 hours on PNID-8.

1.6. Where the Pipeline Operator receives any communications as set out in paragraph 1.7 on either PNID-8 or PNID-9, it must send any communications to a Pipeline User as required under the Code at the latest on PNID-7.

1.7. For the purposes of this Part N, the communications which cannot be sent on a Non-Effective Day are as follows:

- 1.7.1. Agreed Opening Meter Reading;
- 1.7.2. C&D Information;
- 1.7.3. C&D Notification;
- 1.7.4. Capacity Revision Application;
- 1.7.5. Daily Meter Readings;
- 1.7.6. Emergency Contacts
- 1.7.7. Meter Fix Reading;
- 1.7.8. Meter Fit Report;
- 1.7.9. Meter Information Notification;
- 1.7.10. Meter Information Update Notification;
- 1.7.11. Meter Read;
- 1.7.12. Opening Meter Reading;
- 1.7.13. Proposing User's Estimate;
- 1.7.14. Proposing User Read;
- 1.7.15. Revised Meter Reading.
- 1.7.16. Supply Point Confirmation;
- 1.7.17. Supply Point Confirmation Cancellation;

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- 1.7.18. Supply Point First Nomination;
- 1.7.19. Supply Point Nomination;
- 1.7.20. Supply Point Objection;
- 1.7.21. Supply Point Offer;
- 1.7.22. Supply Point Reconfirmation;
- 1.7.23. Supply Point Registration;
- 1.7.24. Supply Point Registration Date;
- 1.7.25. Supply Point Registration Number;
- 1.7.26. Supply Point Renomination;
- 1.7.27. Supply Point Second Nomination;
- 1.7.28. Supply Point Withdrawal.
- 1.7.29. Threshold Rate Increase

1.8 For the purposes of paragraph 1.7, a Bulk Confirmation can be sent on a Non-Effective Day.

1.9 To facilitate the provisions of this Part N, the Pipeline Operator shall provide a Portfolio Extract to each Pipeline User by 17:00 on PNID-6 with details of Supply Meter Points processed on PNID-7. The Portfolio Extract shall be issued in either comma separated value or Microsoft Excel spreadsheet format.

Definitions

CI 5.6

In this Parts C and Parts D and E any reference to a "Supply Point Systems Business Day" is a reference to a Day other than a **Non-Effective Day** or a Saturday, Sunday or a bank holiday in England or Wales.

New Definitions in Part M:

"Project Nexus Implementation Date ('PNID')" is 1 October 2016 or such other date as may be determined by the Uniform Network Code Committee;

"Non-Effective Day" shall have the meaning in Part N1.2;

10. Recommendation

The Workgroup invites the Panel to:

- **AGREE** that iGT082 be submitted for consultation; and
- **AGREE** that Code Administrators should issue iGT082 Draft Modification Report for consultation with a close-out of 13 January 2016 and submit results to the Panel to consider at its meeting on 20 January 2016.

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