

# Modification At what stage is this document in the process? O1 Modification O2 Workgroup Report O3 Draft Modification Report O4 Final Modification Perport

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

This Modification seeks to provide Shippers with the ability to effectively manage their Settlement Performance Obligations and Transportation Costs for Vacant sites.

The Proposer recommends that this modification should be:



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

This modification will be presented by the Proposer to the Panel on 25<sup>th</sup> August 2023. The Panel will consider the Proposer's recommendation and determine the appropriate route.

#### **Impacted Parties and Codes**



High Impact:

Shippers and Suppliers



Medium Impact:

N/A



Low Impact:

Distribution Network Operators, Independent Gas Transporters and Consumers



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# Any questions?

Contact:

**Code Administrator** 



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iGTUNC@Gemserv.c



02070901044

Proposer:

Lee Greenwood -**British Gas** 



lee.greenwood@briti shgas.co.uk



n/a

#### **Timetable**

Initial consideration by Workgroup	14th September 2023
Amended Modification considered by Workgroup	-
Workgroup Report presented to Panel	27 <sup>th</sup> October 2023

Draft Modification Report issued for consultation 30th October 2023 Consultation Close-out for representations 20th November 2023 Variation Request presented to Panel

Final Modification Report available for Panel 15th December 2023 Modification Panel decision 22<sup>nd</sup> December 2023

\*Please note that this timetable should run as close to UNC Modification 0819 as possible\*



### 1 Summary

#### What

This Modification proposes to give Shippers the ability to effectively manage Settlement Performance Obligations and reduce Transportation Costs when the proposed Vacant criteria is met, and a Shipper has chosen to set a site to Vacant.

#### Why

Within the current economic climate there are many domestic and commercial properties that have become Vacant, with the Shipper unable to access the property or contact the customer to obtain meter readings. In certain circumstances, a warrant can be obtained through the courts. However, this can be a costly procedure and requires a considerable amount of time and effort. Despite these facts, Gas Shippers are unable to effectively reduce their Settlement Performance Obligations and Transportation Cost exposure to these sites, as:

- An AQ for a site can only be amended by obtaining meter readings
- A Shipper/Supplier cannot access the site(s) to obtain meter readings
- A Shipper is unable to contact the customer to obtain meter readings

#### How

The Modification proposes that once a site has met proposed Vacant criteria, the Shipper is given the ability to contact the Central Data Service Provider (CDSP) to remove Settlement Performance Obligations and stop Transportation Costs while the site is in a Vacant status.

Shippers would continue to apply the Isolation and Withdrawal process where it is deemed appropriate and possible, noting that the majority of isolations can only be applied with access to the property. The process proposed under this Modification regarding Vacant sites is independent to the current Isolation and Withdrawal processes. There are no proposed changes to the Isolation or Withdrawal processes as a result of this Modification.

This Modification also seeks to introduce additional reporting to Performance Assurance Committee (PAC) (and a corresponding anonymised report) in the Performance Assurance Report Register (PARR) regarding the Vacant Sites process. This is likely to include the count of Supply Meter Points where the CDSP have been notified of Vacant criteria for a site being met and the total count of sites that have a Vacant Status and the duration they have had this status.

#### 2 Governance

#### **Justification for Normal Procedures**

Authority Direction is proposed for this Modification, as the last time this subject was discussed in 2011 (Modification 0282 & 0282A) it was considered a material change and not subject to Self-Governance. The view of Workgroup 0783R was that this was still the case for this Modification due to the potential impacts in Gas Allocation, Reconciliation and UIG.

#### **Requested Next Steps**

This Modification should:



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

#### 3 Why Change?

Currently there is no process that allows Shippers to remove Settlement Performance Obligations or reduce Transportation Costs for Vacant sites without submitting meter readings. However, when a site is Vacant it is difficult for Shippers and meter reading agents to obtain meter readings. In certain circumstances, a warrant can be obtained through the courts. However, this is a costly procedure and requires a considerable amount of time and effort. This leaves Shippers paying inflated Transportation Costs until meter readings are obtained and submitted and accepted into Settlement, noting that some costs become unrecoverable when the last actual reading predates the Line in the Sand date.

By providing Shippers with the ability to reduce Transportation Costs to reflect real time usage it will ensure that Shippers are not paying upfront costs, noting that this would be particularly useful to the smaller market participants that might not have access to large amounts of cashflow for upfront costs, promoting market competition.

Shippers would continue to apply the Isolation and Withdrawal process where it is deemed appropriate and possible, noting that the majority of isolations can only be applied with access to the property. The process proposed under this Modification regarding Vacant sites is independent to the current Isolation and Withdrawal processes. There are no proposed changes to the Isolation or Withdrawal processes as a result of this Modification.

## 4 Code Specific Matters

#### **Technical Skillsets**

Knowledge of Read Submission Process, AQ and SOQ, Gas Allocation, Reconciliation and UIG

#### **Reference Documents**

None

#### 5 Solution

Establish UNC Modification 0819 - Establishing/Amending a Gas Vacant Site process within the IGT UNC.

For the avoidance of doubt, IGT sites are in scope of the 0819 process BUT there are no changes to IGT specific charges.

The detailed solution has been debated within UNC workgroups and can be found on the Joint Office website https://www.gasgovernance.co.uk/0819



# 6 Impacts & Other Considerations

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

There are no impacts identified on a current SCR.

#### **Consumer Impacts**

#### What is the current consumer experience?

Consumers currently being billed on inflated AQ volumes would receive more accurate billing.

#### What would the new consumer experience be?

More accurate billing.

mpact of the change on Consumer Benefit Areas		
Area	Identified Impact	
Improved safety and reliability  The proposed process will likely see increased visits to Vacant sites to monitor and establish if sites are still in a Vacant state with no access.	Positive	
Lower bills than would otherwise be the case  Customers will potentially receive lower bills based on more accurate site consumption.	Positive	
Reduced environmental damage	None	
Improved quality of service	None	
Benefits for society as a whole	None	

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

This Modification relates to UNC Modification 0819 Establishing/Amending a Gas Vacant Site process within the IGT UNC.

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REC	
Other	
None	

#### **Environmental Impacts**

None

# 7 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) Co-ordinated, 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 agreements with other relevant gas transporters) and relevant shippers	
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers	None
(F) Promotion of efficiency in the implementation and administration of the Code	None
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators	None

By providing Shippers with the ability to reduce Transportation Costs to reflect real time usage it will ensure that Shippers are not paying upfront costs, noting that this would be particularly useful to the smaller market participants that might not have access to large amounts of cashflow for upfront costs, therefore promoting Relevant Objective d) Securing of effective competition:

- (i) between relevant Shippers;
- (ii) between relevant Suppliers.



## 8 Implementation

The implementation of this Modification should run as close to UNC Modification 0819 as possible.

# 9 Legal Text

#### **Text Commentary**

To be updated by the Code Administrator.

#### **Suggested Text**

To be updated by the Code Administrator.

# 10 Recommendations

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

Panel is asked to:

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