

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

Purpose of Modification:

This Modification seeks to provide Shippers with the ability to effectively manage their Settlement Performance Obligations and <u>Large Transporter</u> Transportation Costs for Vacant sites.

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

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 25th 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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1 Summary

What

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

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

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 Large Transporter 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 Large Transporter 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-<u>It is recognised that this Modification also seeks to introduce will require</u> additional reporting to Performance Assurance Committee (PAC) (and a corresponding anonymised report) in the Performance



Assurance Report Register (PARR) regarding the Vacant Sites vacant sites process. This is likely to include the count but should not delay progress 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. the Modification.

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 Large Transporter. 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 Large Transporter 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 <u>Large Transporter</u> 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

- UNC 0819 Establishing/Amending a Gas Vacant Site Process.
- UNC 0819 Appendix 1 Vacant Site Guidance Document.

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 <u>transportation</u> 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.

Impact of the change on Consumer Benefit Areas		
Area	Identified Impact	
Improved safety and reliability	Positive None	
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.		
Lower bills than would otherwise be the case	Positive None	
Customers will potentially receive lower bills based on more accurate site consumption.		



Reduced environmental damage	None
Improved quality of service 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.	None Positive
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.

UNC	
REC	
Other	
None	

This Modification relates to UNC Modification 0819

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;		

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(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 <u>Large Transporter</u> Transportation Costs to reflect real time usage it will ensure that Shippers are not paying <u>upfrontfor</u> costs <u>that are not applicable</u>, noting that this would be particularly useful to the smaller market participants that might not have access to large amounts of cashflow <u>for upfront costs</u>, therefore promoting Relevant Objective <u>d(D)</u> 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

Legal Text and Commentary

To be updated by the Code Administrator.

Suggested Text

To be updated by the Code Administrator.

The current version of the legal text for this modification can be found on the IGT168 modification on the IGT UNC website

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.