

# Modification At what stage is this document in the process? O1 Modification O2 Workgroup Report Unplementation of Non Effective Days and Variant Non-Business Days for Project Nexus Implementation (Project Nexus transitional modification) O3 Praft Modification (Project Nexus Implementation) O4 Final Modification (Project Nexus Implementation)

**Purpose of Modification:** This Modification Proposal identifies arrangements relating to the requirement for 'non-effective days' and 'variant non-Business Days' to enable an orderly and efficient transition from current iGT UNC arrangements to the iGT UNC and subsequent UNC regime identified within iGT UNC Modification 039 and subsequent UNC Modifications 0432, 0434 and 0440

The Proposer recommends that this modification should be:



assessed by a Workgroup

This modification will be presented by the Proposer to the Panel on 16<sup>th</sup> November 2016. The Panel will consider the Proposer's recommendation and determine the appropriate route.



High Impact:

Independent Gas Transporters and Pipeline Users



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# Any questions?

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# Timetable

Modification Panel decision

The Proposer recommends the following timetable:		
Initial consideration by Workgroup	1 <sup>st</sup> November 2016	
Workgroup Report presented to Panel	16th January 2017	
Draft Modification Report issued for consultation	TBC	
Consultation Close-out for representations	TBC	
Final Modification Report available for Panel	7 <sup>th</sup> February 2017	

15th February 2017



## 1 Summary

#### What

To enable a smooth and efficient transition to the new supporting systems it is necessary to set out terms within the iGT UNC and UNC Transition Document which identify the dates when iGT systems and the UK-Link System will not be available for normal transactions and processes as identified within the iGT UNC. This modification identifies when the relevant iGT systems would be taken off-line or subject to additional support measures impacting transaction processing.

#### Why

As part of the UK-Link Replacement programme, iGT UNC Modification 039 and subsequent UNC Modifications 0432, 0434 and 0440 will be implemented on Project Nexus Implementation Date (PNID). As a consequence some elements of iGT systems and the UK-Link system will not be available for a period of time to enable critical activities such as migration and recovery to be supported. Clarity in respect of the above would facilitate a smooth, transparent and efficient implementation of the UK Link System and transition for interfacing systems in other industry participants' estates.

#### How

This modification identifies a series of 'non-effective days' when the relevant systems would be taken offline and 'variant non-Business Days' when UK Link Systems shall be subject to additional support measures impacting transaction processing.

#### 2 Governance

Self-Governance procedures are not requested as this Modification is expected to have a material; impact on 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. The implementation of non-effective days would amend the Supply Point transfer timescales pertaining to Pipeline User registration.

This modification does not meet the criteria for Fast Track Self Governance.

Urgent procedures are not requested.

#### **Requested Next Steps**

This modification should:

be assessed by a Workgroup

). It is proposed that the iGT UNC Modification Workgroup develop the iGT UNC modification in parallel with this activity.



## 3 Why Change?

A number of iGT UNC non-effective days and variant non-Business Days are required to facilitate 'cutover' to the new systems being introduced by the Transporters Agency, Xoserve, under the UK-Link Replacement Programme; this proposal is a refreshed version of iGT UNC Modification 082.

For the purposes of clarity it is important to distinguish a non-effective day and the variant non-Business Day from a non-Business Day.

A non-Business Day is reflected within the exceptions described within TPD Sections G1.10 - i.e.
those Days which are other than a Business Day. Pipeline Users may continue to submit Supply
Point Administration (SPA) files on non-Business Days but any such files would not be
processed. In contrast, all UK-Link systems activity concerned with TPD Sections G and M, as
referenced in iGT UNC following implementation of Modification 039, in particular that associated
with updates to the Supply Point Register are typically suspended on a non-effective day.

To enable implementation of the UK-Link Replacement Programme in line with the revised PNID of 1<sup>st</sup> June 2017 it is essential that a number of non-effective days and variant non-Business Days are introduced to the iGT UNC and UNC Transition Document.

Extension of the timescales relating to Supplier switching may impact the consumer experience. The certainty that is afforded by the establishment of non-effective days and variant non-Business Days mitigates any risk of confusion or misunderstanding with respect to the switching process.

The absence of the clarity that this modification would provide could adversely affect timely implementation of the UK Link Replacement Programme at PNID.



## 4 Code Specific Matters

#### **Reference Documents**

Detailed planning for systems Transition will take place in the Transition Progress Group (TPG). Papers are available here. (Note: This group does not meet under UNC governance and the link below is provided for information only)

http://www.xoserve.com/index.php/transitiontest/

#### Knowledge/Skills

The proposed definition of non-effective days and variant non-Business Days would impact part [insert section] of the iGT-UNC as referenced by iGT UNC following implementation of iGT039. As such it is recommended that the iGT UNC Modification Workgroup – whose familiarity with such sections – would be best placed to develop this modification given its members knowledge of the 'retail' related elements of the iGT UNC.

#### 5 Solution

Modification of the iGT UNC is required to identify and incorporate a number of non-effective days and variant non-Business Days within the iGT UNC and UNC Transition Document.

It is proposed that seven non-effective days and two variant non-Business Days are introduced.

#### **Definition of Non Effective Days**

Non-effective days are defined by the modifications that introduce them.

The non-effective day period is proposed to be 25<sup>th</sup> May 2017 to 31<sup>st</sup> May 2017 inclusive. This period of seven non-effective days prior to Project Nexus implementation date would have the following features:

- Such days would not constitute iGT UNC Business Days.
- No Supply Point Confirmations can be submitted.
- No revision of the Supply Point Register can be made.
- None of the following Code Communications may be made: Supply Point Enquiry, Supply Point Nomination, Supply Point Offer, Supply Point Confirmation, Supply Point Objection, Supply Point Withdrawal, request for Isolation, application to increase or reduce Supply Point Capacity, Amend Supply Point Offtake Rate, Revisions to Annual Quantity or NDM Meter Reading and Meter Information Notifications and Meter Information Update Notifications.
- No communication (under the Code or any other contract between the Transporters and Users)
  pursuant to which Transporter would be required to revise the Supply Point Register may be
  made.



#### **Definition of [variant Non-Business Days]**

The period of variant non-Business Days would include the PNID of 1<sup>st</sup> June with the subsequent day being 2<sup>nd</sup> June 2017. These days would have the following features<sup>1</sup>:

- Such days would not constitute iGT UNC Business Days.
- Supply Point Confirmations can be submitted.
- The variant non-Business Days are expected to apply to UNC TPD Sections G and M as referenced by iGT UNC following implementation of iGT039. Communications may be made by Users to Transporters: Supply Point Enquiry, Supply Point Nomination, Supply Point Offer, Supply Point Confirmation, Supply Point Objection, Supply Point Withdrawal, request for Isolation, application to increase or reduce Supply Point Capacity, Amend Supply Point Offtake Rate, Revisions to Annual Quantity or NDM Meter Reading and Meter Information Notifications and Meter Information Update Notifications.
- Communications may be made by Transporters to Users, including response files to the above.

# Extension to Minimum Confirmation timescales to enable two-day period for Supply Point Objections

Users have previously requested a minimum of two days with which to raise a Supply Point Objection which could only be accommodated by extending the minimum Confirmation timescale.

The proposal for two variant non-Business Days, in addition to the seven non-effective day period, means that for certain Supply Point Registration Dates the incumbent User would have less than two days to raise a Supply Point Objection where the proposing User provides the minimum Confirmation timescale as set out in UNC G 2.5.8(b) (and as referenced in iGT UNC following implementation of iGT039).

For the Project Nexus Implementation Date of 1<sub>st</sub> June 2017, this Supply Point Registration Date range is between 2<sub>nd</sub> and 8<sub>th</sub> June 2017.

In order to accommodate a two day objection period a Shipper that requires a Supply Point Confirmation to become effective within the Supply Point Registration Date range referenced above would need to submit the Supply Point Confirmation at an earlier date, effectively extending the minimum Confirmation timescale. Sample timelines are provided to illustrate the timeline around a Change of Shipper event and the Project Nexus Implementation Date, and the contingency date:



MOD XXX June 2017 PNID NEDs\_sample 1.



# 6 Impacts & Other Considerations

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

This Modification Proposal impacts the industry programme for replacement of UK-Link systems. This is because it is necessary to make provision in the iGT UNC for activities (such as those associated with Supply Point Administration) where non-availability of iGT systems has a direct consequences for Pipeline Users, Suppliers and ultimately consumers.

It is essential to the success of the UK Link Replacement Programme.

#### **Consumer Impacts**

This Modification proposes a total of seven non-effective days and two variant non-Business Days.

If the minimum Confirmation timescales are used the incumbent User would not have an opportunity to raise a Supply Point objection; in the past Users have requested a minimum of two days with which to raise any objections. In order to accommodate this objection period a Shipper that requires a Supply Point Confirmation to become effective within the Supply Point Registration Date range referenced above would need to submit the Supply Point Confirmation at an earlier date, effectively extending the minimum Confirmation timescale.

As a consequence of the above the amended Confirmation submission deadlines are:

Supply Point Registration Date	Confirmation submission deadline (normal operation)	Confirmation submission deadline (extended Confirmation timescale)
2 <sup>nd</sup> June 2017	19 <sup>th</sup> May 2017	18 <sup>th</sup> May 2017
3 <sup>rd</sup> June 2017	20 <sup>th</sup> May 2017	18 <sup>th</sup> May 2017
4 <sup>th</sup> June 2017	21 <sup>st</sup> May 2017	18 <sup>th</sup> May 2017
5 <sup>th</sup> June 2017	22 <sup>nd</sup> May 2017	18 <sup>th</sup> May 2017
6 <sup>th</sup> June 2017	23 <sup>rd</sup> May 2017	19 <sup>th</sup> May 2017
7 <sup>th</sup> June 2017	24 <sup>th</sup> May 2017	22 <sup>nd</sup> May 2017
8 <sup>th</sup> June 2017	25 <sup>th</sup> May 2017	23 <sup>rd</sup> May 2017

With respect to the 1<sup>st</sup> June 2017 Project Nexus Implementation Date, the period where Users may not submit Code Communications shall mean that Users need to submit Confirmations by 24<sup>th</sup> May where the Supply Point Registration Date is 9<sup>th</sup> to 15<sup>th</sup> June 2017.

This potentially impacts consumers, but it is expected that switches can be completed within the timescales set out in Supplier's Standard Licence Condition 14A: 'Customer Transfer' which requires gas suppliers to ensure that customer transfers can take place within three weeks of the contractual cooling-off period ending.



## **Cross Code Impacts**

An equivalent modification has been raised to the Uniform Network Code.

No impacts have been identified to any other Codes.

#### **EU Code Impacts**

None identified.

#### **Central Systems Impacts**

This modification proposal is essential for the implementation of the Single Service Provision. 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:	Impacted	
(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	None	
secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers		
	Decitive	
(F) Promotion of efficiency in the implementation and administration of the Code	Positive	
(G) Compliance with the Regulation and any relevant legally binding	None	
decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators		

This Modification is required to enable implementation of Single Service Provision. The measures identified can therefore be expected to facilitate relevant objective f) 'Promotion of efficiency in the implementation and administration of the Code.

Given that the effect of the Modification would be to extend the timescales for transfer of Pipeline User within the transition period there could be a minor negative effect on competition between Shippers. This



Modification therefore does not Securing of effective competition between Shipper Users. facilitate relevant objective d)

# 7 Implementation

This Modification should be implemented upon direction and it would be desirable if this Modification were implemented well ahead of June 1st "2017 to add certainty for all market participants.

8 Legal Text

9 Recommendations

# 10 Appendix 1