Implications for the iGT UNC of UNC Mod 434 Project Nexus – Retrospective Adjustment assuming this Modification will come into force on the 1st November 2018

1.   Background

The legal text for Modification UNC434 is incorporated into the UNC TPD although the Transition document states that Retrospective Data Updates cannot be submitted prior to the 1st November 2018.

The iGT UNC implemented on Nexus Implementation Date was based on the UNC text as supplied by UNC432 and UNC440. These versions did not include UNC434.

However, when iGT086 (iGT086S - Central Data Service Provider - Implementing iGT UNC Changes to support FGO) was developed, this was based on the final UNC text incorporating the UNC434 changes.

2.   Summary/Conclusions

In general, the changes introduced by UNC434 will be picked up by the iGT UNC.

There is one area where a correction to the iGT UNC may need to be made and that is with regard to the introduction of a reference to **Updated Meter Readings** (as per M5.16 of the UNC) which would appear to have been omitted when the FGO changes were being made.

3.   Confirmation exercise to verify that the iGT UNC is in line with the UNC as changed to incorporate UNC 434

A review was carried out of the changes to the UNC legal text as set out in UNC 434 to assess whether the iGT UNC had picked up all these changes.

Changes made by UNC 434 to Section E Daily Quantities

Significant changes were made to Section E by UNC 434 to introduce the concept of Retrospective Data Updates and there impacts on Offtake Reconciliations. It could be that the iGT UNC hasn't picked these up. However, the iGT UNC states in Part F7.1 that "The quantities nominated for offtake by Pipeline Users each Day from the Large Transporter System at the NDM CSEP, and the quantities determined (after each Day) to have been so offtaken at the NDM CSEP, will be determined on the same basis as is provided for in Sections C, E and H of the UNC."

As pointing is only done at the highest level the changes to Section E to allow Retrospective Data Updates (as introduced by UNC 434) will be picked up automatically by the iGT UNC.

Changes made by UNC 432 to Section G Supply Points

CI 6.1 of the UNC has the following:

For the purposes of determining the Annual Quantity the provisions of Section G1.6 of the UNC shall apply with the following changes and subject always to paragraphs 6.2 to 6.4 below.

6.2 directs how the Annual Quantity of a New Supply Point will be calculated and create the RPC Entry Annual Quantity

6.4 Introduces the CSEP NExA Tables Review Process

The only change in Section G introduced by UNC 434 was to introduce 1.6.3(d) a Qualifying Meter Read. CI 6.1 does not directly refer to G1.6.3 so the change will be included through the general reference to G1.6

Changes made by UNC434 to Section M Supply Point Metering

UNC434 made significant changes to M4 Meter Information.

Overall the iGT UNC only points across to M4 at a a high level .

iGT UNC D2.7 **"**Whenever a Supply Meter Installation is replaced or modified (other than by the Pipeline Operator pursuant to Clause 3) the Registered User shall provide to the Pipeline Operator such information concerning the replacement or modification, in accordance with paragraph 4 of Section M of the UNC (as incorporated into Part E by Clause 2 of Part E)"

iGT UNC E2 "Whenever a Supply Meter Installation is replaced or modified (other than by the Pipeline Operator pursuant to Clause 3) the Registered User shall provide to the Pipeline Operator such information concerning the replacement or modification, in accordance with paragraph 4 of Section M4 of the UNC (as incorporated into Part E by Clause 2 of Part E)

iGT UNC E2.1 "For the purposes of this Clause 2 the provisions of paragraph 4 of Section M of the UNC shall apply with the following changes:

the references to paragraphs 5.13.2 (b), 5.13.11 and 5.13.12 of Section M of the UNC in paragraph 4.2.10 shall be interpreted as references to paragraphs 5.13.2 (b), 5.13.11 and 5.13.12 as incorporated into this Part E by Clause 14.1   .

UNC434 makes no changes to paragraphs 5.13.2 (b), 5.13.11 and 5.13.12 of Section M of the UNC so no iGT UNC change is required in this area. Additionally, the reference to 4.2.10 (new paragraph introduced by UNC 434 and picked up by iGT UNC 086S) is still correct

iGT UNC E11.1 "the reference to paragraph 4.2.12 of Section M of the UNC in paragraph 5.10.3 (b) shall be interpreted as a reference to paragraph 4.2.12 as incorporated into this Part E by Clause 2.1". The reference to 4.2.12 (new paragraph introduced by UNC 434 and picked up by iGT UNC 086S) is still correct

Mod 434 amended M 5.14 which is referenced in a number of places in the iGT UNC;

E1.2 points to M5.14 at the high level – no changes required

E15.1 points to M5.14 at the high level – no changes required

E15.1 points to M5.14.1(a) and E5.14.2 - both unchanged by Mod 434

E15.1 points to M5.14.4 "paragraph 5.14.4 of Section M of the UNC shall not apply."

 – this is the reference to Offtake Reconciliation which currently does not apply in the iGT UNC

4.   **Additional Point**

UNC434 introduced a new a paragraph 5.16 Updated Meter Readings.

M5.16 Updated Meter Readings

5.16.1 A User may submit to the CDSP an updated Meter Reading (**"Updated Meter Reading"**) to replace an existing Valid Meter Reading previously submitted by the User pursuant to paragraph 4.3 and this paragraph 5 provided:

(a) the Read Date of the Updated Meter Reading and the Meter Reading which it updates are the same;

b) the Read Date of the Updated Meter Reading;

(i) is on or after the Code Cut Off Date:

(ii) is not a Day in respect of which:

       (1) an Offtake Reconciliation has been carried out pursuant to paragraph 5.12.7;

       (2) in respect of which a Consumption Adjustment has been made;

(c) the User was the Registered User of the Supply Meter Point on the Read Date of the earlier submitted Meter Reading; and

(d) when submitting the Updated Meter Reading the Meter Reading is identified as an updated Meter Reading.

5.16.2 A User may submit an Updated Meter Reading to replace a CDSP estimated Meter Reading determined in accordance with paragraph 5.4.6 provided each of the requirements in paragraph

5.16.1 are satisfied.

5.16.3 An Updated Meter Reading will be Validated in accordance with paragraph 5.3 and following validation by the CDSP the CDSP will notify the User whether or not the Updated Meter Reading is a Valid.

5.16.4 Where the Updated Meter Reading is a Valid the Updated Meter Reading will replace the earlier submitted Meter Reading for the purposes of the Code and any adjustment to an Affected Offtake Reconciliation will be carried out in accordance with Section E6.8.

5.   **Conclusion and Solution**

The iGT UNC doesn't appear to have picked this up as the UNC paragraphs in M5 are referenced across to individually rather than at the highest level.

Proposed Legal Text to correct this omission

Part E (new paragraph)

21 Updated Meter Readings

21.1 For the purposes of this Clause 21 the provisions of paragraph 5.16 of Section M of the UNC shall apply:

Part M (definitions)

"Updated Meter Reading" shall have the meaning ascribed thereto in the UNC;