

Draft Modification Report	At what stage is this document in the process?
<h2>IGT110V:</h2> <h3>Mandating the provision of NDM sample data</h3>	<div style="display: flex; flex-direction: column; gap: 10px;"> <div style="border: 1px solid green; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;">01 Modification</div> <div style="border: 1px solid blue; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;">02 Workgroup Report</div> <div style="border: 1px solid purple; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;">03 Draft Modification Report</div> <div style="border: 1px solid orange; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 5px;">04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>This modification is seeking to introduce an obligation into the IGT UNC for the provision of regular NDM sample data to the Central Data Services Provider (CDSP).</p>	
	<p>This Draft Modification Report is issued for consultation responses at the request of the Panel. All parties are invited to consider whether they wish to submit views regarding this self-governance modification.</p> <p>The close-out date for responses is 7th September 2018, which should be sent to IGTUNC@Gemserv.com. A response template, which you may wish to use, is at the IGT UNC website.</p> <p>The Panel will consider the responses and agree whether or not this self-governance modification should be made.</p>
	<p>High Impact: NA</p>
	<p>Medium Impact: Pipeline Users /CDSP</p>
	<p>Low Impact: Pipeline Operators</p>

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Timetable	
Modification timetable:	
Initial consideration by Workgroup	5 th June 2018
Amended Modification considered by Workgroup	dd month year
Workgroup Report presented to Panel	15 th August 2018
Draft Modification Report issued for consultation	16 th August 2018
Consultation Close-out for representations	7 th September 2018
Variation Request presented to Panel	dd month year
Final Modification Report available for Panel	12 th September 2018
Modification Panel decision	19 th September 2018

 Any questions?

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Work Group Comments

The Workgroup reviewed the suggested timetable for the progression of this modification and highlighted that this was based on a Self-Governance process, unlike the Panel decision of UNC654, which was recommended as an Authority consent modification. The Workgroup were satisfied with the timetable proposed for this Modification.

1 Summary

What

Currently NDM Sample Data can be voluntarily provided to the CDSP using the direction in the [Xoserve NDM Document](#) “Third Party Supplied NDM Sample Data Guidance and File Format Document” – it outlines the data required and in which format. There has been a noticeable reduction in the data volumes being submitted and the number of contributing organisations is extremely low. Within the Uniform Network Code (UNC) there have been multiple modifications and working groups to address issues with Unidentified Gas (UIG) and discussions within Workgroup 0631R have shown that it is possible for organisations to get this information and submit it to the CDSP, however there are currently no mandatory requirements within the IGT UNC.

The creation of new End User Categories (EUCs) are being discussed as part of UNC Workgroup 0644; the creation of these cannot be supported accurately without this sample data. To mandate the provision of these samples within the UNC modification 0654 has been approved by the UNC Panel for development and this IGT UNC modification seeks to introduce a requirement into the IGT UNC so IGT supplies are not excluded from profiling.

Why

This sample data provides insight into the Class 3 and 4 customer behaviours and helps support development of allocation profiles and EUCs by the Demand Estimation Sub-Committee (DESC). Although the current Transporter sample allows viable profiles to be derived by DESC it has proved essential to boost this sample with Shipper/Supplier provided data for the past two years. The low volumes of data don't allow for accurate profiling activity – particularly in the proposed new pre-payment and small Industrial & Commercial (I&C) EUCs being developed by DESC to improve allocation. If the data cannot be provided this will prevent the required improvements to the allocation profiles which could lead to further issues within Unidentified Gas (UIG) and will certainly prevent improvements in this key area.

Without inclusion in the IGT UNC as well as the UNC the sample data will not be reflective of the industry as a whole. It benefits from all segment and portfolio types as well as from GT and IGT supplies.

How

This modification is seeking to introduce an obligation to mandate the provision of NDM Sample Data on a regular basis, and with a minimum submission requirement of twice a year, all in accordance with the solution approved in UNC, currently being developed via Modification 0654 - Mandating the provision of NDM sample data.

Modification 0654 outlines the file format of the requirements plus reporting intended for the Performance Assurance Committee (PAC).

As Modification 0654 is intended to have IGT related rules this proposal seeks to just point to the UNC to enable the provisions to minimise the risk of requirements becoming misaligned in the future.

2 Governance

Justification for Self-Governance Procedures

The proposed changes do not have a material impact on Consumers, competition, the pipe-line system, management of the market or governance procedures. This modification is seeking to introduce reporting obligations which would qualify as Self-Governance.

The UNC Panel did not grant self-governance status to 0654, and although recommended as self-governance for both modifications it is proposed that IGT110 follows the same process and timings as 0654 as they deliver the same requirements and there is a dependency on 0654 being implemented for IGT110 to also be.

Requested Next Steps

This modification should:

- be subject to self-governance
- be assessed by a Workgroup

We support the progress in line with 0654 - Mandating the provision of NDM sample data.

Work Group Comments

The Workgroup agreed with the Proposers view that this Modification should be Self-Governance, although acknowledged currently this is not aligned to the initial UNC Panel Assessment for UNC654.

3 Why Change?

Currently there is no mandated obligation for parties to share NDM Sample Data with the CDSP and over the last few years the quantity of data and participating organisations has dwindled for GT supplies and there hasn't been any obligation for IGT supplies. The limited data is impacting the development of improved profiling as there is not enough data to support the required granularity of customer types and cannot therefore support the creation of any new EUCs, such as pre-payment or small I&C supplies.

The aim of this modification is to mandate the provision of the dataset in accordance with the solution approved for modification 0654 - Mandating the provision of NDM sample data.

This is a Code matter because the current requirements are on a voluntary basis within the UNC so this modification seeks to make it a mandatory obligation for a minimum data set. This wouldn't however stop parties from providing more data if they felt it would be beneficial.

It is anticipated that there will be no change to the mandated Transporter/CDSP NDM samples as these continue to form the backbone of the profile calculation.

The NDM Sample data is to be in line with the formatting outlined in the "Third Party Supplied NDM Sample Data Guidance and File Format Document". However, it is not currently proposed to make this a UNC related document as the data provision is key, rather than the format.

The introduction of the PAC reporting will enable monitoring of the data provision and will allow the PAC to develop any required next steps and ensure that IGT data is provided where applicable in Pipeline Users sample data.

4 Code Specific Matters

Reference Documents

Modification 0654:

<https://www.gasgovernance.co.uk/0654>

Third Party Supplied NDM Sample Data Guidance and File Format Document:

<https://www.gasgovernance.co.uk/sites/default/files/ggf/book/2017-12/File%20Format%20%28Third%20Party%20NDM%20Sample%20Data%29%20v6.0.pdf>

Knowledge/Skills

Knowledge of the NDM Demand Estimation processes

5 Solution

It is proposed to add a clause into Part F to link to Section H 1.6 of the UNC so it can link the IGT UNC to the UNC so they will align (subject to 0654 approval). High-level the UNC solution will:

- Introduce an obligation on Shippers with Product Class 3 and/or Product Class 4 Supply Meter Points to provide a data cut at least twice a year but can be provided on a monthly, quarterly or twice-yearly basis for Supply Meter Points with 12 months or more data
- The data and business rules will be in line with the formatting outlined in the “Third Party Supplied NDM Sample Data Guidance and File Format Document” which are specified in the 0654 solution
- Additional to the documented guidance is the introduction of a minimum submission of 100 Supply Meter Points
 - All submissions are to be representative of the Shippers actual portfolio by EUC
- Where a Shipper has GT and IGT Supply Meter Point(s) the sample should contain a section of both
- Although the current guidance stipulates a maximum of 100 Supply Meter Points, if parties wish to submit additional data this should not be precluded but by bilateral agreement with the CDSP
- There will be a portfolio threshold size of \geq 25,000 Supply Meter Points, and once this threshold is met the reporting is required even if the portfolio drops $<$ 25,000
- Although the 0654 requirements are aligned to the voluntary requirements it doesn't preclude Pipeline Users from submitting more, it is just to be bilaterally agreed with the CDSP
- A report for the PAC will be produced to help monitor timeliness of submissions and also ensuring the data meets the criteria outlined, the reporting will be further developed by the PAC

Work Group Comments

The Workgroup discussed the proposed solution and agreed that this enables the IGT UNC to align fully to the solution proposed in UNC654. The Workgroup acknowledged that this modification only grants the relevant permissions needed for the inclusion of IGT data and does not detail the CDSP system changes needed for this.

6 Impacts & Other Considerations

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

None

Consumer Impacts

None

Environmental Impacts

None

Cross Code Impacts

There are UNC impacts as the modification seeks to align with modification 0654.

No impacts are anticipated for the SPAA.

The CDSP will be required to deliver the PAC reporting outlined in 0654

Work Group Comments

The Workgroup agreed with the proposer's suggestion that there will be no Consumer costs resultant of this modification's implementation.

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 (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	None
(D) Securing of effective competition: (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	None
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are	None

satisfied as respects the availability of gas to their domestic customers	
(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 Cooperation of Energy Regulators	None

This modification has a positive impact on Relevant Objective F) as the data provision will have a positive impact on the profiling within the demand forecasting process for new and existing EUCs leading to improved allocation and reduced UIG. It also supports UNC modifications 0644 and 0654.

The PAC reporting will ensure monitoring and compliance checks are completed on the data provision.

Work Group Comments

The Workgroup agreed that the modification would have a positive impact on Relevant Objective F) Promotion of efficiency in the administration of the Code. The Workgroup also recognised that by implementing this modification it would also have a positive impact on Relevant Objective D) Securing of effective competition, as this should improve cost targeting and therefore further competition between Shippers and Suppliers.

8 Implementation

As self-governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised and subject to the UNC Modification being implemented to create the UNC text which this IGT modification will reference.

It is recommended that IGT110 is implemented aligned with 0654.

Work Group Comments

The Workgroup agreed with the Proposers suggestion of implementation and highlighted the importance of aligning this release with UNC654.

9 Legal Text

Suggested Legal Text

Part F - DAILY AND ANNUAL QUANTITIES AND SHRINKAGE

3 Demand Determination – NDM Supply Points and NDM Sampling

3.1 The UNC provides (in Section H of the UNC) for the establishment of Demand Models and End User Categories for each Gas Year.

3.2 Pipeline Users acknowledge that it is aware of the consultation process provided for in the UNC in respect of such matters.

3.3 The Pipeline Operator will adopt and apply for each Gas Year the End User Categories (of NDM Supply Point) established by the Large Transporter pursuant to Section H1.9 of the UNC and will allocate each NDM Supply Meter Point to one of such categories.

3.4 Where a Pipeline User is an NDM Sampling Shipper User, such Pipeline User shall comply with paragraphs 1.6.10 through 1.6.14 of Section H of the UNC.

Part M

“NDM Sampling Shipper User” shall have the meaning ascribed thereto in the UNC;

Work Group Comments

The Workgroup agreed that the proposed legal text supports the proposed solution.

10 Recommendations

Panel’s Recommendation to Interested Parties

The Panel would like to highlight that the equivalent UNC modification ([UNC654](#)), which is running concurrently to IGT110V, is currently being processed as an Authority modification, contrary to the Proposers initial recommendation. This is following an initial UNC Panel decision where discussions at Panel highlighted there may be material links to the solution. During UNC Distribution Workgroup discussions, the Workgroup felt that any materiality that may have been considered by the Panel previous to its development no longer exists and have recommended to Panel that the status of this is changed in line with IGT110V.

The Panel have recommended that this report is issued to consultation and all parties should consider whether they wish to submit views regarding this self-governance modification also taking into consideration the above information.

The Panel also noted that some workgroup parties believed that, in addition to Relevant Objective F, the Modification could support Relevant Objective D (Securing of Effective Competition) as refinement of End User Categories (which the NDM Sampling process supports) could improve cost targeting. Parties are invited to submit any views they may have with regard to this Objective D as well as Objective F.