





Final Modification Report	At what stage is this document in the process?
<h1>IGT110V:</h1> <h2>Mandating the provision of NDM sample data</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 5px;">01</span> Modification         </div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 5px;">02</span> Workgroup Report         </div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 5px;">03</span> Draft Modification Report         </div> <div style="border: 1px solid #ccc; padding: 2px; display: flex; align-items: center; gap: 5px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 5px;">04</span> Final Modification Report         </div> </div>
<p><b>Purpose of Modification:</b></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>Panel consideration is due on <b>19<sup>th</sup> September 2018</b></p> <p>The Panel recommends implementation</p>
	<p>High Impact:</p> <p>NA</p>
	<p>Medium Impact:</p> <p>Pipeline Users /CDSP</p>
	<p>Low Impact:</p> <p>Pipeline Operators</p>

Contents		 Any questions?
<b>1 Summary</b>	<b>3</b>	Contact: <b>Code Administrator</b>
<b>2 Governance</b>	<b>3</b>	 <b>IGTUNC@gemse rv.com</b>
<b>3 Why Change?</b>	<b>4</b>	 <b>020 7090 1044</b>
<b>4 Code Specific Matters</b>	<b>5</b>	Proposer: <b>Kirsty Dudley</b>
<b>5 Solution</b>	<b>5</b>	 <b>Kirsty.Dudley@eone nergy.com</b>
<b>6 Impacts &amp; Other Considerations</b>	<b>6</b>	 <b>07816 172 645</b>
<b>7 Relevant Objectives</b>	<b>6</b>	
<b>8 Implementation</b>	<b>7</b>	
<b>9 Legal Text</b>	<b>7</b>	
<b>10 Consultation</b>	<b>8</b>	
<b>11 Panel Discussions</b>	<b>10</b>	
<b>12 Recommendations</b>	<b>11</b>	

## Timeline

### Modification timetable:

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

## 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 (UG) 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 (UG) 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 Consultation

Panel invited representations from interested parties on this modification and the consultation closed on 7<sup>th</sup> September 2018. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Representations were received from the following parties:			
Organisation	Response	Relevant Objectives	Key Points
E.ON	Support	F - positive D - positive	<ul style="list-style-type: none"> <li>We support the mandating of the sample data, it will have a positive impact to the modelling.</li> <li>The creation of the PAC reporting acts as a first step to monitor the data delivery, any further steps or sanctions can be developed at a later date, if required.</li> <li>We would consider the request for the data as self-governance, although it links with UIG the data doesn't influence the daily position but more ensures accuracy of the modelling. As this modification just enables a report and the monitoring of report submission we do not feel it is a material change and would support self-governance for the UNC and the IGT UNC modification.</li> <li>Low cost, costs include creation and implementation of the enduring report.</li> <li>Around 3 months implementation to allow for the creation of the enduring report.</li> </ul>
BU-UK	Qualified Support	F - positive D – neutral	<ul style="list-style-type: none"> <li>We support the intent and proposals from IGT110V and support the modification on the condition that it is implemented in line with UNC 654, following its own approval. This is due to the proposed legal text changes from IGT110V</li> </ul>



			<p>pointing over to the UNC, and if UNC 654 is not approved there is little sense for IGT110V's own implementation.</p> <ul style="list-style-type: none"> <li>• As either the codes would not align, or Shipper data would only be collected from IGTs which would not be efficient for the purposes of profiling as the modification intends.</li> <li>• Under this condition the proposed changes will allow for more efficient data analysis around profiling activities. The minimum standards will act as a suitable benchmark with the option for additional submission of data from parties throughout the year.</li> <li>• Whilst it is noted that the UNC Panel has recommended that the UNC mirror modification, UNC 654, should be implemented via Authority consent, we agree with the proposers for UNC 654 and this IGT110V that the change should progress through Self Governance. This is due to there being no identified material impacts with the change focused on reporting from sample data.</li> <li>• In line with the workgroups assessment it is agreed that implementation should fall in line with UNC 654 if it too is approved.</li> <li>• The legal text provided seems sufficient to meet the intent.</li> </ul>
ESPUG	Support	F - positive	<ul style="list-style-type: none"> <li>• We agree with the proposer that an enhanced level of reporting of NDM sample data will have a positive impact on the profiling within the demand forecasting process for new and existing EUCs. This will lead to improved allocation and reduced levels of UIG.</li> <li>• We agree that this modification is suitable for self-governance.</li> <li>• We agree that ideally this modification should be implemented at the same time as UNC 0645.</li> <li>• ESP has always supported and will continue to promote the principle of enhancing the availability of data in order to improve network balancing.</li> </ul>

In summary:

- Three responses were received to the consultation for IGT110V, incorporating one response from a Pipeline User, and two responses from Pipeline Operators.
- Two respondents offered support to this modification. One Pipeline Operator offered Qualified support to this modification.
- Where support was offered, respondents agreed that the Modifications better facilitated Relevant Objectives F) Promotion of efficiency in the implementation and administration of the Code. One respondent noted that they believed Relevant Objectives D) was not met as suggested by the Proposer.
- All respondents agreed that the Modifications did meet the criteria for Self-Governance.
- All respondents agreed that the proposed Legal Text supported the requirements of the solution.
- Views on implementation timing were agreed that this should be implemented in line with UNC654. One respondent sought a three-month implementation lead time for the creation of an enduring report.

## 11 Panel Discussions

### Discussion

The Panel discussed that the UNC modification had received unanimous support and that this will be decided at the UNC Panel meeting on 20th September 2018. The Panel discussed that materiality is still to be determined by the UNC Panel at their meeting on 20th and that the proposer of the UNC modification would be suggesting it is Self-Governance, and not an Authority modification, as is currently suggested by the UNC Panel.

The Panel discussed the governance of IGT110V, and whether this can be changed so the two modifications can take the same implementation path. The Chair suggested that as the solutions of the two modifications are different there is currently no case to change the governance, but implementation of IGT110V without an implementation of UNC0654 would not make sense as the proposed IGT UNC legal text points across to UNC legal text that is being added by UNC0654.

### Consideration of the Relevant Objectives

All Panel members agreed that this Modification meets the criteria set out in Objective F and the published criteria for Self-Governance modifications.

### Determinations

The Panel agreed to defer the IGT Panel decision until UNC654 had been decided upon. The Panel convened a resolution in writing (as per IGT UNC Part L7.7) on 21<sup>st</sup> September 2018, following the UNC Panel decision to implement UNC564 as a self-governance modification.

The vote was carried out with three Pipeline Users and three Pipeline Operators. The Panel decided that the Modification should be implemented by a unanimous vote.

The Panel agreed that, as a Self-Governance Modification, it should be implemented in the scheduled release date in February 2019 in accordance with the CDSPs estimation of delivery of the solution. This is subject to the desire to align with an implementation date agreed with the UNC, which as of 26<sup>th</sup> September 2018, is still undecided. The decision to implement is subject to a 15-day appeal window as per the Self-Governance process.

## 12 Recommendations

### Panel Determination Self-Governance

Members agreed:

- that Modification 110V should be implemented
- the preferred implementation date is the 1<sup>st</sup> March 2018, recognising that this is subject to the need to maintain alignment with the implementation date set for UNC654