





Modification	At what stage is this document in the process?
<h1>IGT159:</h1> <h2>Amendments to the Must Read process</h2>	<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p>Purpose of Modification:</p> <p>To update the Must Read process to include timescales for a site to enter the process, and to introduce timeframes for procuring and returning a read that align with Central Data Service Provider (CDSP) validation criteria.</p>	
	<p>The Proposer recommends that this Modification should be:</p> <ul style="list-style-type: none"> assessed by a Workgroup <p>This Modification will be presented by the Proposer to the Panel on 28th January 2022. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>
<p>Impacted Parties and Codes</p>	
	<p>High Impact: None</p>
	<p>Medium Impact:</p> <p>Shippers, Transports, Suppliers, UNC, CDSP, as well as positive impacts on consumers</p>
	<p>Low Impact: None</p>

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Timetable

The Proposer recommends the following timetable:

Initial consideration by Workgroup	10 th February 2022
Amended Modification considered by Workgroup	14 th July 2022
Workgroup Report presented to Panel	26 th August 2022
Draft Modification Report issued for consultation	26 th August 2022
Consultation Close-out for representations	19 th September 2022
Variation Request presented to Panel	-
Final Modification Report available for Panel	21 st October 2022
Modification Panel decision	28 th October 2022

This Modification was raised on 24th January 2022 and was presented to the Panel on 28th January 2022. The Proposer raised an Amended Modification (v2.0) on 3rd February 2022, which was considered by Workgroup on 10th February 2022. A second Amended Modification (v3.0) was raised on 21st July 2022, which was considered by the Workgroup in draft form on 14th July 2022. The timetable above reflects the journey of this Modification since v3.0 was considered by the Workgroup.



Any questions?

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1 Summary

What

The current Must Read process is not fit for purpose and amendments are required to address inconsistencies between codes. Currently, the Must Read process is triggered for all IGT sites where it is four months from the last valid read and for sites on Distribution Networks (DNs), the process is triggered for large supply points only (i.e. AQ >73,200 kWh).

Currently, there are no timescales for a read to be obtained and returned to the Shipper, which can result in a read not being utilised in settlement and the site not being removed from the Must Read process.

SMART and Automatic Meter Reading (AMR) meters can have an active Data Communications Company (DCC) flag but may be non-communicating and issues can take longer than four months to resolve due to the complexity of the issues that can arise. Treatment of these sites is also not consistent; following the implementation of [XRN5036 - Updates to must read process](#), AMR and SMART/DCC active sites are excluded from the Must Read process for DN sites.

An improvement to the process would be to utilise a site visit and for any faults or visible concerns with the meter, or any specific issues obtaining a read, are recorded and reported.

Shippers taking on new sites under Supplier of Last Resort (SoLR) arrangements may not have an opportunity to obtain actual readings for all new sites; therefore, the ability for Shippers to amend reads where sites are obtained under SoLR should be introduced.

The Must Read data provided to IGTs is currently never refreshed. This can result in a visit to a site to obtain a read for a meter that is no longer in situ, or a visit to a site where the Shipper has obtained a reading after the site entered into the process (for example by resolving the issue with a non-communicating SMART or AMR meter, or the customer has simply provided a read). These additional and unnecessary visits to a site are not only wastage but also creates a poor experience for customers and can create complaints for the Supplier.

Issues within the current Must Read process, as noted above, will be exacerbated by the implementation of Modification [UNC0692s - Automatic updates to Meter Read Frequency](#) (and [XRN4941 – Auto updates to meter read frequency](#)), which places an obligation on the CDSP to automatically update the Meter Read Frequency of a Class 3 or 4 Supply Meter Point to Monthly if certain criteria are met and is applicable to both the UNC and IGT UNC. It is expected that an additional 60,000 sites across the industry will enter the Must Read process following implementation of UNC0692s.

Why

This Modification would:

- improve settlement accuracy and Unidentified Gas (UIG);
- protect customers from additional cost and unnecessary contact associated with site visits; and
- reduce the number of customer complaints received by Suppliers.

How

This Modification seeks to introduce the following:

- Rules for IGTs to provide reads within an agreed window which allows validation of the read into Settlement.

- A specific process for SMART and AMR meters with an active DCC flag;
- A specific process for sites gained via the SoLR process to allow the new Shipper the opportunity to obtain a read;
- A specific process for excluding sites with known issues preventing a read from being obtained; and
- Provision of data to the PAC for oversight of sites paused from the Must Read process.

2 Governance

Justification for Self-Governance Procedures

IGT159 was originally submitted as a Self-Governance Modification Proposal. The Panel considered IGT159 at its meeting on 28th January 2022. The Proposer and Panel agreed that the Modification would have material impacts on consumers and therefore should not be Self-Governance. The Proposer agreed to submit an amended Modification Proposal.

IGT159 will therefore be progressed as an Authority Decision Modification.

Requested Next Steps

This Modification should:

- be assessed by a Workgroup.

3 Why Change?

The current Must Read process is not fit for purpose and amendments are required to address inconsistencies between codes. Currently, the Must Read process is triggered for all IGT sites where it is four months from the last valid read and for sites on DNs, the process is triggered for large supply points only (i.e. AQ >73,200 kWh).

These issues will be exacerbated by the implementation of Modification UNC0692s (and XRN4941), which places an obligation on the CDSP to automatically update the Meter Read Frequency of a Class 3 or 4 Supply Meter Point to Monthly if certain criteria are met. It is expected that an additional 60,000 sites across the industry will enter the Must Read process following implementation.

Currently there are no timescales for a read to be obtained and returned to the Shipper, which can result in an obtained read not being utilised in settlement and the site not being removed from the Must Read process if the read fails validation.

SMART and AMR meters can have an active DCC flag but be non-communicating and issues can take longer than four months to resolve due to the complexity of the issues that can arise. Treatment of these sites needs to be consistent; following the implementation of XRN5036 AMR and SMART/DCC active sites are excluded from the Must Read process for DN sites.

Shippers taking on new sites under SoLR arrangements may not have an opportunity to obtain actual readings for all new sites; therefore, the ability for Shippers to amend reads where sites are obtained under SoLR should be introduced.

The Must Read data provided to IGTs is currently never refreshed. This can result in a visit to a site to obtain a read for a meter that is no longer in situ, or a visit to a site where the Shipper has obtained a

reading after the site entered into the process (for example by resolving the issue with a non-communicating SMART or AMR meter, or the customer has simply provided a read). These additional and unnecessary visits to a site are not only wastage but also creates a poor experience for customers and can create complaints for the Supplier.

It was an original intention of this Modification to update the reporting requirements, however, there has been a data cleanse carried out as part of the CMS rebuild which would help with data quality issues. The CMS team have confirmed that the Must Read process would be improved as part of the rebuild project and refreshing current data would also be part of the requirements to be built in. Therefore, this element of the Modification has been removed.

4 Code Specific Matters

Technical Skillsets

A good understanding of meter reading processes, including how reads are obtained, validated, read and submitted. As well as an understanding of how to calculate energy consumption from meter readings.

Reference Documents

UNC TPD Section M – Supply Point Metering

5 Solution

Solution

This Modification seeks to introduce the following:

- Rules for IGTs to provide reads within an agreed window which allows validation of the read into Settlement;
- A specific process for SMART and AMR meters with an active DCC flag;
- A specific process for sites gained via the SoLR process to allow the new Shipper the opportunity to obtain a read.
- A specific process for excluding sites with known issues preventing a read from being obtained; and
- Provision of data to the PAC for oversight of sites paused from the Must Read process.

This Modification seeks to change the process as is in IGT UNC Part E Meter Reading.

Business Rules

1. **IGTs to provide reads (as a result of the ‘failure to obtain readings’ obligations) to the CDSP, within the standard validation window of 25 Supply Point System Business Days (SPSBDs) after the read has been obtained:**
 - a. IGTs cannot charge for a read that is submitted more than 25 SPSBDs after being obtained.
2. **The ability to exclude sites with a known meter issue preventing reads being obtained from the obligations under ‘failure to obtain readings’ (Must Read process):**
 - a. Ability for Xoserve to receive notifications from IGT / Shipper of a known meter issue so that sites can be excluded from the must read process.

- Ability for Xoserve to notify Shipper where IGT notified them of known meter issue.
 - Shipper / IGT to notify Xoserve of sites with known meter issues.
- b. PAC to receive information on the number of sites removed from the process and how long it takes for the issue to be resolved.
- 3. Exclusion of SMART, AMR and Active DCC sites from the ‘failure to obtain readings’ obligations (Must Read process). For avoidance of doubt, this change will align with the current DN treatment of SMART, AMR and Active DCC sites in relation to the ‘failure to obtain readings’ logic.**
- a. MPRNs that meet one or more of the following conditions should be excluded from the ‘failure to obtain readings’ obligations:
 - i. have a SMART Meter associated,
 - ii. have an AMR Indicator; or
 - iii. have an active DCC flag.
 - b. For the avoidance of doubt, the above sites will continue to be included in pre-notifications to Shippers where the required Read performance has not been met, however these sites would be excluded from the Must Read generation process.
- 4. Supplier of Last Resort (SoLR)/Change of Shipper(CoS):**
- a. Where a Shipper has gained a site via the SoLR process, the timeline for the site to trigger the ‘failure to obtain readings’ logic should be paused for a period of 4 months from the point the incoming Shipper obtains the site to allow the new shipper the opportunity to obtain a read.
 - b. Where there is a CoS event, the timeline for the site to trigger the ‘failure to obtain readings’ logic should be paused for period 4 months from the point the incoming Shipper obtains the site to allow the new shipper the opportunity to obtain a read.
- 5. Provision of data to PAC for oversight of sites paused from the Must Read process.**

6 Impacts & Other Considerations

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

No

Consumer Impacts

What is the current consumer experience?

It is currently a poor consumer experience as additional site visits, for example, are causing additional contact and increased costs for consumers. Where a meter is SMART there is a consumer understanding that the meter should be read automatically and therefore the customer may wonder why they are getting site visits. The cost of living crisis means consumers are willing to provide their own reading for more accurate billing so the level of understanding and engagement parties are seeing is increasing.

What would the new consumer experience be?

This Modification would improve the customer experience as the information collected would be accurate and up to date, which would reduce the need for additional site visits. More accurate settlements could result in reduced costs which may impact bills as customers will be charged for reads that can be validated and used for settlement.

Other improvements to consumer experience include:

- Customers potentially experiencing less visits which helps with improved safety, reducing the fear of bogus callers and doorstep crime.
- More joined up working with the Shippers, IGTs and Xoserve; and
- Improved forecasting which could equate to lower bills.

Impact of the change on Consumer Benefit Areas

Area	Identified Impact
<p>Improved safety and reliability</p> <p><i>Will this change mean that the energy system can operate more safely and reliably now and in the future in a way that benefits end consumers?</i></p> <p><i>This area would relate to changes which balance the system safely, securely and at optimum cost, particularly for consumers in vulnerable situations. It would also consider changes which introduce flexibility across the market to flow energy at the most efficient profile, lower operational costs and make sure GB consumers can access the cheapest sources of energy.</i></p>	Neutral
<p>Lower bills than would otherwise be the case</p> <p><i>Will this change lower consumers' bills by controlling, reducing, and optimising spend, for example on balancing and operating the system?</i></p> <p><i>This area would relate to changes that are likely to benefit end consumers. This could include any change where it has been demonstrated that it could lower bills for end consumers.</i></p> <p><i>If possible, this section should include any quantifiable benefits.</i></p>	Positive
<p>Reduced environmental damage</p> <p><i>Will this proposal support:</i></p> <ul style="list-style-type: none"> • <i>new providers and technologies?</i> • <i>a move to hydrogen or lower greenhouse gases?</i> • <i>the journey toward statutory net-zero targets?</i> • <i>decarbonisation?</i> <p><i>This area would relate to changes which demonstrate innovative work to design solutions which ensure the system can operate in an environmentally sustainable way both now and in the future.</i></p>	Positive

Improved quality of service <i>This area would focus on demonstrating why and how the change can improve the quality of service for some or all end consumers. Improved service quality ultimately benefits the end consumer due to interactions in the value chains across the industry being more seamless, efficient and effective.</i>	Positive
Benefits for society as a whole <i>This area would relate to any other identified changes to society, such as jobs or the economy.</i>	None

Cross-Code Impacts

This Modification is likely to have an impact on the UNC, specifically Section M – Supply Point Metering. This Modification may also impact Settlement Accuracy, the Retail Energy Code (REC) and the Smart Energy Code (SEC).

UNC	<input checked="" type="checkbox"/>
REC	<input checked="" type="checkbox"/>
SEC	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>
None	<input type="checkbox"/>

Environmental Impacts

None anticipated.

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	Positive

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	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

(D) Securing of effective competition: Accurate Must Read information and updated time frames will promote higher rates of meter read submission and more accurate AQs. Thus, more accurate gas allocation and reconciliation, which will promote competition by reducing a barrier to entry that is currently being created by the high and unexplained levels of UIG.

(F) Promotion of efficiency in the implementation and administration of the Code: as both the UNC and IGT UNC will be aligned. It should also equate in better settlement and efficiency of the rules of the Code.

8 Implementation

As soon as possible.

9 Legal Text

Text Commentary

Legal Text will be developed as part of the assessment of the Modification.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Refer this proposal to a Workgroup for assessment.