

Rough Order of Magnitude (ROM) Request and Response

1. Purpose of a ROM

The DSC CDSP Service Document – Change Management Procedure sets out the expectations of the ROM process.

4.6.2 Subject to paragraph 4.6.3, within 10 Business Days after receiving a ROM Request, the CDSP shall send to the Customer and the Committee a report (Rough Order of Magnitude Report or ROM Report) setting out (so far as the CDSP is able to assess at the time):

(a) a high level indicative assessment of the impact of the Potential Service Change on the CDSP Service Description and on UK Link;

(b) the CDSP's opinion as to whether the Potential Service Change would be a Restricted Class Change, would have an Adverse Impact on any Customer Class(es) or would be a Priority Service Change, where applicable;

(c) the CDSP's approximate estimate of:

(i) the Costs (or range of Costs, where options under paragraph (e) are identified) of Implementing the Potential Service Change;

(ii) the impact of the Potential Service Change on Service Charges; and

(iii) the period of time required for Implementation;

(d) any material dependencies of Implementation on other Proposed Service Changes or other likely Priority Questions; and

(e) if it is apparent to the CDSP that there are likely to be materially different options as to how to Implement the Potential Service Change, a high level description of such options.

2. ROM Request – To be completed by the customer

Please populate the details below and send to box.xoserve.portfoliooffice@xoserve.com, to enable the CDSP to undertake the impact assessment to provide the ROM Response (section below).

Please note, the ROM requestor may be asked for further details if it is believed that request is not clear and additional information is required in order to provide a ROM Response.

2a. ROM Request Details

ROM Request Details	
Change Title	Establishing the Independent Shrinkage Charge and the Independent Shrinkage Expert (UNC 0843) and Independent Shrinkage Expert and Independent Shrinkage Charge (IGT 165)
Regulatory Impact	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Regulatory Reference (if applicable)	UNC Modification 0843 IGT UNC Modification 165
Change Overview	<p>The changes have been raised to incentivise the reduction of greenhouse gas emissions and lower customer bills. The Modifications introduce the role of the Independent Shrinkage Expert (ISE) who will establish:</p> <ul style="list-style-type: none"> • the Independent Shrinkage Model (ISM), • the Independent Shrinkage Model Methodology (ISMM) • Independent Shrinkage Statement (ISS), and • the Independent Shrinkage Charge (ISC). <p>Based on the Modifications, the elements which require CDSP input are:</p> <ul style="list-style-type: none"> • Procurement and ongoing management of the ISE <ul style="list-style-type: none"> ○ As per the Modification, Xoserve as the CDSP will be responsible for procuring and maintaining a contract for the Independent Shrinkage Expert role (ISE). ○ The ISE will be contractually obligated to create the ISM, ISMM, ISS and the ISC on an annual basis. <p><u>Please note, the cost range to procure and maintain an ISE will not be provided within this ROM. This is because it is a brand-new role, and we cannot provide an accurate cost range before we have started the procurement exercise and got views from parties interested in tendering to be the ISE. Based on this, the industry (or designated industry representatives) will not see a cost range or quote on the ISE until the Modification is approved and the procurement process has commenced.</u></p>

The following elements of the change need to be assessed by the CDSP:

- **Loading and assigning daily shrinkage**

- Currently each year the CDSP receives and loads the daily shrinkage values per LDZ provided by each DNO into Gemini.
- Each day, that shrinkage energy quantity gets assigned within Gemini, to the DNO who has to buy that much gas.

- **Under this change, the CDSP need to assess and provide a high-level impact of:**

- As well as having DNO shrinkage values, [depending on Ofgem decision \(see scenarios below\)](#), the CDSP will also need to accommodate the receipt (from the ISE) for [Independent Shrinkage Charges \(ISC\) for the DNOs and IGTs which will need to be loaded and assigned within Gemini. Please note, the loading individual IGT shrinkage values which contribute to the LDZ shrinkage into Gemini and assigning this to the relevant IGT to buy that much gas is a new concept.](#)

- **Scenario A (deemed approval);** Where Ofgem have not confirmed disapproval of the DNO Independent Shrinkage Charge (ISC) and the IGT ISC before the start of the Formula Year, the CDSP must include the DNO ISC and the IGT ISC in the shrinkage values loaded into Gemini and assigned to the relevant DNO or IGT. *Please note, as the activity to load DNO estimated shrinkage into Gemini is already undertaken by the CDSP, it is expected that the DNO ISC (where not disapproved by Ofgem), will be added to the DNO shrinkage estimates provided per LDZ. We currently do not receive or process IGT estimated shrinkage, therefore where the IGT ISC is not disapproved by Ofgem, the IGT ISC will be loaded into Gemini and will not need to be added or combined with other shrinkage values provided by the IGT). This requirement is to ensure, where Ofgem do not disapprove the DNO and IGT ISCs, that the relevant DNOs and IGTs buy gas that covers the ISC (plus any shrinkage values they calculated).*

As stated in ROM Response V1.0, the shrinkage estimates (including the DNO and IGT ISC) are required 10 business days ahead of the Formula Year to allow the CDSP to upload to Gemini.

- o Scenario B (disapproval from Ofgem pre-start of the Formula Year): Ofgem disapprove the ISE DNO ISC and IGT ISC prior to them being loaded into Gemini. As per current business-as-usual the DNO shrinkage estimates would apply and should be uploaded to Gemini as per the existing process.

No DNO ISC or IGT ISC will apply and therefore no shrinkage associated with IGTs will be loaded in Gemini.

Q) If Ofgem disapprove the DNO ISC and IGT ISC within 10 business days from the start of the Formula Year, is it possible, given the 2-week lead time for the CDSP to receive and load the values, to ensure only the DNO provided shrinkage estimates are loaded into Gemini for go live on the 1st April (start of Formula year)?

- o Scenario C (disapproval from Ofgem post start of the Formula Year): Ofgem retain the right to disapprove the DNO ISC and the IGT ISC after the start of the Formula Year. In the event that Ofgem do disapprove the DNO ISC and IGT ISC, the CDSP must 'reverse' payments to purchase gas to cover the ISC by adding to the Amendment Invoice.
- o In practice, this will mean that the DNO and IGT ISC applied up until the disapproval will need to be reversed and only the shrinkage estimates provide by the DNOs should be applied.

Q) In this scenario, would the existing mechanisms utilised during reconciliation work to 'reverse' the shrinkage costs?

Q) If those mechanisms were utilised, would this have unintended consequences on UIG?

For avoidance of doubt, Scenarios A, B, C and D capture Business Rule from V11.0 of Modification 0843.

- o Where the ISE shrinkage values are approved by Ofgem, for DNOs, the CDSP must add the ISC to the DNO provided shrinkage values to be loaded in Gemini and assigned to the relevant DNO. This is to ensure the DNO buy gas that covers the shrinkage value they calculated, plus the ISC confirmed by the ISE.

- **Reflecting the approved shrinkage values within UIG**

If the ISE DNO ISC and IGT ISC shrinkage values are not disapproved by Ofgem, the CDSP must ensure these approved values are not accounted for in UIG.

Please note, this is expected to be a BAU activity that already occurs with the only difference being that the estimated shrinkage values may include the DNO ISC and IGT ISC be those calculated by the ISE rather than just the DNO shrinkage estimates, if approved by Ofgem.

- Reconciliation of shrinkage

Business-as-usual DNO Shrinkage Reconciliation Process:

- Currently not later than 31 July each Formula Year after the end of the Financial Year, the DNOs evaluates review their original assessed shrinkage estimates and may where appropriate undertake a reconciliation in accordance with the LDZ Shrinkage Adjustment Methodology as per UNC if they have bought the wrong amount of gas.
- Where there is a reconciliation, from a process perspective, this goes onto the Shipper Amendment invoice as a change to the UIG energy amount on the Amendment invoice, using daily SAP prices, and looks very similar to an LDZ measurement error.
- Under this change, for the purpose of reconciliation, the CDSP ~~would,~~ dependent on the above scenarios A-C, may need to undertake the reconciliation activity as a result of the ISE reconciliation as well as the DNOs.
- If Ofgem did not disapprove the DNO ISC and IGT ISC before the start of the Formula Year (Scenario A), then the ISE reconciliation values (updated DNO and IGT ISCs) should be applied and utilised by the CDSP.
- If Ofgem disapproved the DNO ISC and IGT ISC (Scenario B and C), then APPROVAL from Ofgem is required before the ISE reconciliation values can be utilised by the CDSP. In these scenarios, our assumption is that the ISE would only send the ISC reconciliation values to the CDSP where they have received approval from Ofgem. Based on this assumption, where the CDSP receive the ISC reconciliation values, these will be utilised and applied in the system.
- Please can we account for the requirement to receive shrinkage reconciliation values from the ISE as well as the DNOs.

Q) How would we manage receiving a reconciliation report followed by a subsequent report with different values? What logic would the system follow?

Q) Can we confirm how we would process changes as a result of the reconciliation values from either DNOs or ISE?

Please note, this is expected to be a BAU activity that already occurs with the only difference being that the shrinkage reconciliation values may be those calculated by the ISE rather than the DNO.

- **Support / representation at shrinkage industry meetings**
 - It is anticipated that the CDSP will need to provide representative at the Independent Shrinkage Expert industry meetings. There is expected to be a business / operational representative attending these meetings which needs to be considered by Xoserve and our Service Provider. These are likely to be every month, plus possible ad hoc additional meetings.

Under this ROM request, we have not included any request for the CDSP to support data retrieval. This is because the data required by the ISE is unknown but expected to be that held by Transporters directly. During detailed design we will look to confirm if any costs need to be included for the CDSP to support these data retrieval activities.

Please note, the response and proposed solutions within this ROM are based on the assumption that if 0843 was implemented, the required licence changes would have come into effect and the DNOs and IGTs would be able to purchase the DNO and IGT ISC as required under 0843. Without these changes, the solution proposed within the ROM would not work and could not be implemented.

Date Raised [27/09/2023](#)[11/03/2024](#)

Required Response Date [25/10/2023](#)[25/03/2024](#)

Requestor Contact Details	Name:	Customer Change Team on behalf of 0843 Workgroup
	Organisation:	Xoserve on behalf of 0843 Workgroup
	Email:	n/a
	Number:	n/a
	Contact Name:	Ellie Rogers / Kathryn Adeseye

Xoserve Lead Contact (to be provided by the CDSP)	Contact Email:	Ellie.rogers@xoserve.com / Kathryn.Adeseye@xoserve.com
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3. ROM Response – To be completed by the CDSP

The ROM response provided is based on a high-level indicative assessment of the impact of the change.

Please note, all the sections within this template should be populated by the CDSP when providing a ROM response.

To find the high-level costs and timescales please go to section 3c which can be found [here](#).

3a. Impacted Constituency

Customer Class(es) Impacted by Change:	<input checked="" type="checkbox"/> Shipper	<input checked="" type="checkbox"/> Distribution Network Operator
	<input type="checkbox"/> NG Transmission	<input checked="" type="checkbox"/> IGT
	<input type="checkbox"/> All	<input type="checkbox"/> Other <Please provide details here>
Justification for Customer Class(es) selection	<p>From the initial assessment, the anticipated impacted Customer Classes would be DNOs, IGTs and Shippers who are Shrinkage providers. Reasons for this are included below:</p> <ul style="list-style-type: none"> • Gemini system – If the ISC is approved by the Authority, the relevant DNOs and IGTs will be obliged to purchase volumes of gas to cover the corresponding ISC via their Shipper on Gemini daily. • Gemini system – The CDSP will load Daily ISC values into Gemini and the DNOs and IGTs will need to contract with a Shipper(s) to cover the Daily ISC. 	

3b. Overview of impacts

Overview of impacts	<p>Loading and assigning daily shrinkage</p> <p>This will impact the Gemini System directly.</p> <ul style="list-style-type: none"> • The existing ‘Maintain LDZ Shrinkage Quantity’ screen will be enhanced to record DNO Shrinkage and IGT Shrinkage values for an LDZ. As a result, DNOs and IGTs will be separately assigned their proportion of LDZ Shrinkage. • For the avoidance of doubt, for the purpose of calculating UIG, Shrinkage will not be split between DNOs and IGTs. Ultimately, the combined value of Shrinkage (DNO and IGT) will be used for UIG calculations. • The CDSP will continue to enter the LDZ Shrinkage quantities via the online screen. • New functionality will be introduced to capture the mapping of IGTs to the LDZs. This is to allow the IGT Shrinkage for a specific IGT and LDZ to be assigned and mapped as currently Shrinkage
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is assigned at an LDZ level which has a 1-2-1 relationship with a single DNO.

- New functionality will be introduced to input/modify the ISC values against each IGT at LDZ level.
- Based on the current understanding of the change and the high-level analysis undertaken, there are no anticipated impacts to the files generated by Gemini and sent to other systems via the existing file transfer mechanism.

Scenario A (deemed approval) – this scenario can be accommodated and there are no changes required to our original response.

Scenario B (disapproval from Ofgem pre-start of the Formula Year) - this scenario can be accommodated and there are no changes required to our original response.

Q) If Ofgem disapprove the DNO ISC and IGT ISC within 10 business days from the start of the Formula Year, is it possible, given the 2-week lead time for the CDSP to receive and load the values, to ensure only the DNO provided shrinkage estimates are loaded into Gemini for go live on the 1st April (start of Formula year)?

A) For anything less than 10 business days we would try to action on a reasonable endeavours basis but with a hard cut off of 2 business days prior to 1st April. Less than 2 business days it would not be possible to stop the estimates loading due to the processes involved.

Scenario C (disapproval from Ofgem post start of the Formula Year) - Amendments can be made within the system to prospectively update the estimates for the financial year. Retrospective changes would need to be carried using the functionality of the LDZ shrinkage adjustment process. DNO's would need to submit the adjustment request to the CDSP or an adjustment request would need to be processed.

Q) In this scenario, would the existing mechanisms utilised during reconciliation work to 'reverse' the shrinkage costs?

A) Yes, there are existing processes that can be used to reverse the allocation of shrinkage energy (the LDZ shrinkage adjustment process).

Q) If those mechanisms were utilised, would this have unintended consequences on UIG?

A) No

Reflecting the approved shrinkage values within UIG

This will impact the Gemini System directly.

- The combined value of the DNO Shrinkage and IGT Shrinkage will be used for UIG calculations.

Please see separate presentation document for example:



MOD 0843 Resonse
Example.pdf

Reconciliation of shrinkage

UK Link System:

From an annual reconciliation perspective, currently after the end of the financial year, the DNOs will provide a revised energy and financial value (applying daily SAP prices). This is provided within an existing file flow (ORD –LDZ Energy Adjustment Submission) to the CDSP and loaded into UK Link.

The CDSP will process the energy and financial amounts onto the Amendments invoice, once received from the DNOs. If the DNOs should have purchased more gas, it is a credit to Shippers via UIG Reconciliation and the DNOs pick up the charges, and vice versa if the DNOs purchased too much gas.

It is the CDSPs assumption based on the Modification 0843 Business Rules that this process will continue.

The CDSP would still expect the annual shrinkage reconciliation data to be received by UK Link in the existing file flow (ORD- LDZ Energy Adjustment Submission).

As a result of Modification 0843, it is expected that the annual shrinkage reconciliation data could be sent by the DNO and the ISE.

Reconciliation of Shrinkage – Scenario Outcomes

Business-as-usual DNO Shrinkage Reconciliation Process:

- Currently not later than 31 July each Formula Year, the DNOs review their assessed shrinkage estimates and where appropriate, undertake a reconciliation in accordance with the LDZ Shrinkage Adjustment Methodology as per UNC.
- Where there is a reconciliation, from a process perspective, this goes onto the Shipper Amendment invoice as a change to the UIG energy amount on the Amendment invoice, using daily SAP prices, and looks very similar to an LDZ Measurement Error.
- **Under this change, for the purpose of reconciliation, the CDSP, dependent on the above scenarios A-C, may need to undertake the reconciliation activity as a result of the ISE reconciliation as well as the DNOs.**
- If Ofgem did not disapprove the DNO ISC and IGT ISC before the start of the Formula Year (Scenario A), then the ISE reconciliation values (updated DNO and IGT ISCs) should be applied and utilised by the CDSP.
- If Ofgem disapproved the DNO ISC and IGT ISC (Scenario B and C), then APPROVAL from Ofgem is required before the ISE reconciliation values can be utilised by the CDSP. *In these scenarios, our assumption is that the ISE would only send the ISC reconciliation values to the CDSP where they have received approval from Ofgem. Based on this assumption, where the CDSP receive the ISC reconciliation values, these will be utilised and applied in the system.*

Please can we account for the requirement to receive shrinkage reconciliation values from the ISE as well as the DNOs.

Q) How would we manage receiving a reconciliation report followed by a subsequent report with different values? What logic would the system follow?

A) We can accommodate multiple ORD returns for a single month's Amendment Invoice and UK Link will combine them on the invoice. If we process the ISE reconciliation at the same time as the DNO submission, we will not be able to differentiate between them within the Amendment Invoice Supporting Information. If the subsequent report is processed at a different time (different invoice month) then we can differentiate the DNO and ISE submissions within the Amendment Invoice Supporting Information.

Q) Can we confirm how we would process changes as a result of the reconciliation values from either DNOs or ISE?

A) See above.

The following assumptions have been considered while preparing the response:

- No changes are expected in the existing input data file flow in which the annual shrinkage values are received by the UK Link system (.ORD file flow).
- Where the ISE conducts the annual shrinkage reconciliation and this needs to be processed centrally, the ISE is expected to submit the required information (energy and financial amounts) within the existing format (.ORD file flow).
- There will be no split between the DNO and IGT portion of data received by the UK Link system.
- Shrinkage values will be received at LDZ level.
- No changes to the existing smearing process within the UK Link system.
- No changes to any downstream process in the UK Link system.
- The Request to Bill (RTB) process currently followed by the CDSP where the DNOs are required to pick up the annual shrinkage charges, is assumed to continue as is. This process can also be used for the IGT shrinkage charging if required and approved as a result of the ISE reconciliation.

Support / representation at shrinkage industry meetings

We believe support / representation at industry meetings related to shrinkage and the ISE process is likely to be required. As the level of this support, knowledge and skills required is currently unknown, we are unable to identify and quantify appropriate resource effort at this point. This will be considered at detailed design.

3c. High level costs and timescales

Costs provided within the ROM response are indicative and high level based on high level analysis.

Below details the high-level implementation cost range and provides an indication of any ongoing costs identified from the high-level analysis.

Implementation costs

An enduring system solution will cost at least £175,000 but probably not more than £300,000.

We do not anticipate any additional costs based on the changes in the most recent Modification. The initial estimate range of the ROM remains unchanged. (For clarity the range does not take into consideration the procurement of an ISE and is purely takes into consideration system impacts.)

Ongoing costs

- Systems – The change is not expected to increase ongoing running costs.
- In terms of support / representation at shrinkage industry meetings, this will be assessed once further details are known.

Timescales:

Implementation:

- Systems – The high-level estimate to develop and deliver this change is approximately 16 weeks and includes 2 weeks of Post Implementation Support.
- Procurement of the ISE – As stated, we have not provided an indicative cost range for the procurement and ongoing activities of an ISE but from a timescale perspective, please note that a lead time will be required to undertake the procurement exercise to appoint an ISE. Typically, a minimum of 12 months is required to undertake a procurement exercise to appointment, however due to this being a new role, we are expecting to undertake a two-phased approach to initially understand what bidders can offer, followed by a more targeted second-phase. Based on this, we would anticipate a more realistic minimal lead time to be 18 months. Please note, we expect that a Stakeholder Evaluation Panel will need to be appointed ahead of the procurement going ahead.

Ongoing process:

To confirm, to load the approved Shrinkage values into the system on an ongoing basis for the start of the process year (01 April), the CDSP require a minimum **lead time of 2 weeks**. This means the CDSP must have the approved Shrinkage values to be utilised for the year, at least **2 weeks** before the 01 April.

Validity of ROM:

Please note, the information provided in the ROM response is an 'at a point in time' assessment which is valid for 6 months.

3d. Release type

Please provide a view on the anticipated release type this change would need to be delivered under.

Release Type	<input checked="" type="checkbox"/> Ad-hoc / Stand-alone	<input type="checkbox"/> Minor
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	<input type="checkbox"/> Major
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Next available Release (based on the Release Type)	ChMC approval to Release scope	ChMC approval of Detailed Design
Ad-hoc - TBC	TBC	TBC

3e. Impact on Service Line(s)

Impact on Service Line(s)	<p>Currently Service Lines exist to account for the provision of data to DNOs for the purpose of shrinkage and the activity to input shrinkage values into Gemini.</p> <p>These existing Service Lines (ASGT-NC-SA10-04, ASGT-NC-SA9-20) come under:</p> <ul style="list-style-type: none"> Service Areas 10 – Invoicing Customers Service Area 9 – Customer Reporting <p>As a result of Modification 0843 / IGT165, the CDSP will be responsible for procuring and managing a new contract for an Independent Shrinkage Expert (ISE). This will require new DSC Service Line(s). Worth noting, Modification 0843 BR18 currently suggests that DNOs and IGTs should fund the role of the ISE in a split to be agreed under the relevant DSC Change Proposal.</p> <p>Another new Service Line(s) will need to be created to account for the CDSP also inputting shrinkage values into Gemini on behalf of IGTs as well as DNOs (currently this is only actioned for DNOs).</p> <p>Other new Service Line(s) or amendment to existing Service Line(s) maybe be required in relation to ensuring the amount of UIG allocated to Shippers has taken into account the shrinkage value approved by Ofgem (DNO values or ISE values). Plus, any potential support in terms of provision of data.</p>
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3f. Assumptions

- Any changes in the approach to the solution may affect the overall schedule and costs for the change.
- Costs are high level, based on high level analysis. Detailed analysis will be needed to determine the final solution which will impact both cost and schedule.
- Any costs associated to Market Trials are not included.
- The high-level analysis is based on changes to central systems and does not account for changes to customer systems as a result of any potential work.
- The high-level analysis and costs are based on current production system.

- Gemini system – Given the proposed timetable for the UNC Modification it is assumed that the Gemini system changes would be implemented after Gemini Sustain Plus has delivered therefore the high level analysis and costs have been assessed based on the upgraded Gemini system.
- Gemini system – Shrinkage values will continue to be calculated/applied at LDZ level.
- Gemini system – Where there is more than one IGT operational within an LDZ the ISE will provide a Shrinkage value per IGT per LDZ.
- Gemini system – A list of the IGTs mapped to LDZs will be made available to the CDSP to be set up in Gemini.
- Gemini system – The aggregated LDZ Shrinkage quantity (DNO Shrinkage + IGT Shrinkage) will be used for the UIG calculation and downstream processes.
- No reporting requirements have been considered.
- UK Link system – No change in the input data (ORD file- LDZ Energy Adjustment Submission) in which the annual shrinkage values received by the UK Link system. LDZ_ADJUSTMENT_RQ and the corresponding amount values will be received at LDZ level. There will be no split between the GT and IGT portion of data received by the UK Link system.
- UK Link system – No changes to the existing smearing process within the UK Link system.
- UK Link system – Annual shrinkage values will be received at LDZ level.

4. Version Control

Version	Date:	Author	Status
1.0	20/07/2022	Ellie Rogers	Clean version