

## **DSC Change Proposal Document**

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#### **A1: General Details**

Change Reference:	XRN5237			
Change Title:	Maintenance of a User relationship table for the purpose of AQ amendments (Modification 0736)			
Date Raised:	18/09/2020			
	Organisation :	Xoserve		
Sponsor Representative	Name:	Ellie R	ogers	
Details:	Email:	ail: Ellie.Rogers@xoserve.com		
	Telephone: +44 1212 292 185			
	Name:	e: Ellie Rogers		
Xoserve	Email:	Ellie.Rogers@xoserve.com		
Representative Details:	Telephone:	+44 1212 292 185		
	Business Owner:	твс		
Change Status	Proposal	With DSG Out for Review		Out for Review
Change Status:	U Voting	Approved		Rejected

#### **A2: Impacted Parties**

	Shipper	Distribution Network Operator	
Customer Class(es):	NG Transmission	⊠ ІGТ	
		Other [Specify here]	
Justification for Customer Class(es)	Shippers are the party responsible for submitting AQ Corrections therefore as this change effects this process, Shippers are an impacted party.		
selection			

#### A3: Proposer Requirements / Final (redlined) Change

Problem Statement:	Shippers within the same organisation or group can currently utilise AQ amendments reason code 3 to amend the AQ of a site.



	Modification 0736 has been raised amendments process to clarify the amendments can be made.	•			
	This Change Proposal has been raised to deliver the central changes required as set out within this Modification.				
	Please note that this change was initially raised to deliver alternate Modifications 0736 and 0736A. These Modifications have now been decoupled, so Modification 0736 remains under this Change Proposal. Modification 0736A has now become 0746, which will have a separate Change Proposal associated with it.				
	At a high level, the CDSP are expected to hold and maintain a Shipper 'relationship table' which details where Shippers are within a group.				
Change Description:	For the avoidance of doubt, the Shippers will be responsible for confirming with the CDSP their group details and until confirmed (either their group or the absence of a group), reason code 3 (TPD G2.3.21(c) cannot be utilised for an AQ amendments. Shippers will also be responsible for updating the CDSP of any amendments to the group details.				
	Where an AQ Correction is submitted utilising reason code 3, the CDSP will be expected to check the previous User and the registered User against the 'relationship table'. If it is identified that the previous User is within the same group as the registered User, the submitting User will be requested to cancel the AQ amendments ahead of it going live within UK Link.				
	In the absence of the registered User cancelling the AQ amendments upon request, the CDSP will cancel such reques before it goes live within UK Link.				
	It is anticipated that certainly initially, there will be a manual element to the solution and process associated with this change therefore under this CP, the CDSP will also consider how AQ Corrections which were submitted using reason code 3 and have gone live within UK Link can be reversed if they are later challenged due to the Shippers being within the same group.				
Proposed Release:	TBC – Implementation is anticipat	ed outside of a release			
Proposed	10 Working Days	15 Working Days			
Consultation Period:	20 Working Days	No Consultation Period required			



#### A4: Benefits and Justification

Benefit Description:	AQ amendments submitted using reason code 3 will be disallowed where the previous and registered User are within the same organisation group.
	What, if any, are the tangible benefits of introducing this change? What, if any, are the intangible benefits of introducing this change?
<b>Benefit Realisation:</b> Following implementation when an AQ Correction is sub	
	When are the benefits of the change likely to be realised?
Benefit	The benefit is dependent on Modification 0736 being approved for the CDSP to deliver this change.
Dependencies:	Please detail any dependencies that would be outside the scope of the change, this could be reliance on another delivery, reliance on some other event that the projects has not got direct control of.

#### A5: Final Delivery Sub-Group (DSG) Recommendations – Removed

(see Section C for DSG recommendations)

#### A6: Service Lines and Funding

Service Line(s)	Service Area 1 - Manage Supply Point Registration		
Impacted - New or existing	New Service Line anticipated to maintain a relationship table for the purpose of AQ amendments utilising reason code 3.		
Level of Impact	ТВС		
If None please give justification	N/A		
Impacts on UK Link Manual/ Data Permissions Matrix	TBC – must be consider as part of the change assessment		
Level of Impact	ТВС		
If None please give justification	N/A		
	Customer Classes/ Funding	Delivery of Change	On-going Budget Amendment
	🛛 Shipper	100 %	XX %
Funding Classes	National Grid Transmission	XX %	XX %
	Distribution Network Operator	XX %	XX %
	🗌 IGT	XX %	XX %
	Other <please specify=""></please>	XX %	XX %
ROM or funding details:	An assessment needs to be undertaken to understand the effort associated with this change.		
Funding Comments:	The existing Service Line for AQ amendments is under Service Area 1 (ASGT-CS SA1-06) which is 100% Shipper funded.		



#### A7: ChMC Recommendation – Initial review

Change Status:		Reject		Defer
DSC Consultation Issue:	🗌 Yes		🛛 No	

#### A7: ChMC Recommendation – Solution review

Change Status:	Approve Reject			Defer	
Industry	⊠ 10 Working Days [		🗌 15 Wor	15 Working Days	
Consultation:	20 Working Days		Other [	Other [Specify Here]	
DSC Consultation Issue:	🖂 Yes		🗌 No		
Date Issued:	16/11/2020				
Comms Ref(s):	2718.5 - RT- PO				
Number of Responses:	2 approval and 1 rejected response				
	🖂 Shipper		Appro	oved	
Solution Voting:	National Grid Transmission     Please select		e select.		
Solution Voting:	Distribution Network Operator Approved		oved		
	☐ IGT Approved		oved		
Meeting Date:	09/12/2020				
Release Date:	Release: Adhoc date TBC.				

#### A8: ChMC Recommendation – Detail Design

Change Status:	Approve	🗌 Reject		Defer	
Industry	☐ 14 Working Days		🗌 15 Wor	15 Working Days	
Consultation:	20 Working Days		Other [	Specify Here]	
DSC Consultation Issue:	⊠ Yes		🗌 No		
Date Issued:	14/12/2020				
Comms Ref(s):	2741.1 - RT - JR				
Number of Responses:	2 approval and 1 rejected response				
Solution Voting:	Shipper Approved				



	National Grid Transmission	Please select.
	Distribution Network Operator	Please select.
	🗌 IGT	Please select.
Meeting Date:	13/01/2021	
Release Date:	Release: Adhoc Proposed January	

## Section C: DSG Discussion

#### C1: Delivery Sub-Group (DSG) Recommendations

(To be removed if no DSG Discussion is required; Xoserve to collate where DSG discussions occur)

DSG Date:	23/11/2020
DSG Summary:	Ellie Rogers (ER) presented the slides in relation to XRN5237. ER explained that the impact assessment has been done and is currently out in a Solution Option Change Pack. This IA is only looking specifically at Mod736 solution as Mod0736A which is the alternate is expected to be decoupled. <i>Post meeting update –</i> <i>Modification 0736 and 0736A have been decoupled and</i> <i>Modification 0736 and 0736A have been decoupled and</i> <i>Modification 0736 has been renumbered to 0746.</i> . ER continued to go through the slides in relation to this change. It was highlighted that we are looking to implement a predominantly manual solution for this change to get this implemented as quickly as possible following Mod0736 approval. Based on this, the CDSP are not looking to hold the relationship table within the system, it is anticipated to be held offline. CDSP will be required to identify invalid AQ corrections as per Mod0736 and notify the relevant Shipper where they identified. Shippers will be requested to cancel any identified AQ corrections and if the AQ correction isn't cancelled by the relevant Shipper, this will be done by the CDSP on the Shippers behalf. KD asked if there will be any reporting for the manual solution. ER explained that currently there is no formal reporting in scope of the change or Mod, with nothing currently expected to be going out to PAC. It was noted that where the CDSP have to cancel the AQ correction on the Shippers behalf, this may be a chargeable service. This will be mentioned be covered in the detailed design Change Pack. In relation to reporting, KD asked if this is something that will need to be considered, or if that this will happen on such a rare occasion that the reporting is not needed. ER explained that we are hoping that this will not be required often as it expected to be an exceptions process. It was also noted, that we are expected that the implementation of this change will be immediate and

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	therefore required to put in place the absolute requirements to manage the process and potentially look at the reporting on this at a later date potentially through PAC. KD explained it would be beneficial to understand where this activity
	will be left to the CDSP to carry out, and if this is charged it would be easy to count the occurrences on this, however if not it may be more difficult to capture the stats behind this. ER explained that this is essentially being implemented as a quick fix to get what we need,
	and reporting can definitely be considered at a later date, along with a larger review of the AQ reason code process as a whole, potentially leading to a more enduring and automated process. ER
	explained that there is most likely a way the team can cover reporting manually on the number of occurrences and this doesn't feel problematic if a view of volumes was requested. KD agreed
	that this would be sufficient. ER explained the MOD will go to the December Panel meeting for approval, if approved it will go for a 16-day appeal window, and this then sits with Cadent to confirm an implementation date. This is
	likely to be as soon as the 16-day appeal window has closed (mid- January 2021).
	EL explained that she did not fully understand the purpose of this change, as their view is that this should be covered through Performance Assurance reporting and this is not the responsibility
	of the CDSP to cover, and this should not be avoided through a preventative measure but through performance assurance. ER explained this change is making sure that the process aligns
	with that set out within Modification 0736 and what will be stated within Code. EL explained that she understood the reasoning behind the change but putting in a preventative measure to cover
	performance that is deemed outside of the UNC measures feels uncomfortable. KD asked that with the kind of challenges being raised does this cause the implementation to slow down. PO
	explained that if the MOD is approved and an implementation is agreed and set, this is something we would have to deliver in line with the DSC contract. EL explained she agrees with the change,
	however not necessarily the point that poor performance would potentially be covered by the CDSP. ER explained this should be an exceptional process that we wouldn't expect to happen on a
	regular occurrence, however EL stated that they are unsure the cost vs. benefit would be beneficial for the Industry if this is such an exceptional occurrence.
	It was highlighted that the 'preventive measures' had been proposed due to the potential impact across multiple industry parties if invalid AQ corrections where submitted and went live in the system. KD explained that they support the intent of the change,
	however we need to ensure we monitor where these occurrences are happening. DSG members noted that the Solution Change Pack had been
	issued and should they wish to make any comments about this, they should raise it within a representation response. It was confirmed the Solution CP would be voted on by ChMC in December.
Capture Document / Requirements:	<pre>cember. </pre>



DSG Recommendation:		Reject	Defer
DSG			
Recommended	Release: Feb / Jun / Nov XX or Adhoc DD/MM/YYYY		
Release:			

# Section D: High Level Solution Options

#### **D1: Solution Options**

	The link to Change Proposal XRN5237 can be found here.	
Please note – this Solution Change Pack relates to a ta implementation of Modification 0736 ONLY. This does include any changes necessitated by Modification 073 Modification 0736 is approved, we are anticipating a re immediate implementation and therefore we have prop with providing the associated solution impact in help a with the anticipated Modification implementation.		
	As Modification 0736 is still being developed, we will provide the Solution Change Pack for this at a later date. Worth noting, Modification 0736A focuses on the retrospective application of 0736 rules and therefore our assessment is that this is not as time sensitive.	
Solution Option	Background	
Summary:	XRN5237 has been raised to deliver the changes proposed through UNC Modification 0736 - Clarificatory change to the AQ amendment process within TPD G2.3	
	This Modification proposes to make a change to the AQ amendment process outlined in the Uniform Network Code Transportation Principles Document Section G 2.3 (UNC TPD G2.3) in order to clarify the circumstances in which such amendments can be made.	
	It seeks to provide clarity in the UNC around where a Shipper can utilise AQ correction reason code 3. If implemented, Shippers should not submit an AQ correction utilising reason code 3 if the previous Shipper is 25% or more affiliated with the current Shipper who is requesting the AQ correction.	



At high level XRN5237 seeks to ensure:	
<ul> <li>Introduction of a Shipper 'relationship table' held by the CDSP, which the Shipper will need to notify relationships via email. Where the Shipper has not done so all Reason Code 3 corrections will not be able to become effective.</li> <li>Monthly identification of any AQ corrections submitted using reason code 3 where the registered Shipper is within the same group as per the 'relationship table' as the previous Shipper therefore the AQ correction cannot become effective</li> <li>A communication process to contact relevant Shipper(s) who have submitted any AQ corrections which cannot become effective</li> <li>Where necessary, in the absence of Shipper cancellation, the CDSP will cancel the identified AQ corrections</li> <li>Process to reverse AQ correction which should not have gone live as per the rules introduced under Modification 0736</li> </ul>	
High Level Solution Option	
The High-Level Solution Option (HLSO) for this change is available and can be found here: <u>LINK TO HLSO</u>	
The HLSO outlines Xoserve have identified one option to deliver the requirements for the change:	
Option 1: CDSP hold the Shipper 'relationship table' to identify and prevent AQ corrections under reason code 3 where the submitting and previous Shipper are Affiliated as per Modification 0736 becoming effective.	
Due to the anticipated requirement to implement this change relatively immediately if Modification 0736 is approved, the proposed solution is predominantly manual.	
This allows for delivery outside of a scheduled release and also means the impact and costs are lower.	
As you'll see within the HLSO, the high-level cost estimate for this change is $\pounds 20,000 - \pounds 30,000$ .	
The main impact is the amendment of existing reports to ensure they are fit for purpose to identify what is required this change.	
The other impacts are manual effort to hold and maintain the Shipper 'relationship table', writing out to Shippers and submitting AQ cancellations on behalf of Shippers. The effort associated to these elements are anticipated to be absorbed by existing resource.	
General Considerations:	



	• The solution presented within this CP is expected to be an interim solution to accommodate a quick implementation.	
	<ul> <li>We are aware that discussions are occurring within the industry about a bigger review of AQ correction processes.</li> <li>If following this AQ review the requirements under XRN5237 remain the same, we will look to assess and propose a more systematised solution under a 'part B' delivery.</li> <li>If the AQ review changes what has been introduced under XRN5237, the associated changes will be picked up through another Change Proposal.</li> </ul>	
	• We are anticipating that Shippers may be charged where the CDSP has to submit the AQ correction cancellation on their behalf.	
	<ol> <li>Please note Modification 0736 has not been approved yet and it is expected to be voted on by Panel in December. If Panel reject Modification 0736, the solution proposed under this Change Pack will not be progressed.</li> </ol>	
Implementation Date for this Solution Option:	An ad-hoc release is expected. The actual delivery date is to be confirmed but expected to be in January 2020.	
Xoserve preferred option: (including rationale)	Option 1. This is the only solution option proposed as it allows an implementation outside of a release and supports deferral of a system implementation to support requirements in this Modification is recommended until the outcome of an expected industry review of AQ corrections confirms that these requirements endure.	
DSG preferred solution option: (including rationale)	XRN5237 will discussed at the DSG meeting on 23 <sup>rd</sup> November. Any views or preferences provided at DSG on the solution option will be included within the representations presented to ChMC.	
Consultation closeout:	30/11/2020	



### Section E: Industry Response Solution Options Review

#### E1: Organisation's preferred solution option

	Ormoniantian	
User Contact	Organisation:	EDF
	Name:	Eleanor Laurence
Details:	Email:	eleanor.laurence@edfenergy.com
	Telephone:	07875117771
	We agree with updating UNC to clarify, however I have been unable to find quantification anywhere for how much of a problem this is financially and why we are proposing to put in a safety net which is not encouraging shippers to change behaviours, moreover allowing them to submit and do nothing as reversal will be done for them.	
Organisation's preferred solution option, including rationale taking into account costs, risks,	This is an obligation within the UNC and as a result should be treated as such, where not complying shippers should be pulled up through PAC and dealt with accordingly whether that be through proportional fines at the level of the detriment to the industry.	
We believe change should not be implemented to hand performing shippers – where cost of initial change is fina the rest of the industry. This – as stated by Xoserve – is solution in order to implement in Jan 2021 (understandir there is a proposal for a part B solution which as per my points – don't deem to be the right approach). We seem focussing on cure rather than prevention across the indu and don't feel this is the right approach.		pers – where cost of initial change is financed by dustry. This – as stated by Xoserve – is a rushed to implement in Jan 2021 (understanding that sal for a part B solution which as per my earlier eem to be the right approach). We seem to be re rather than prevention across the industry of late
Implementation Date:	Reject	
Xoserve preferred solution option:	Reject	
DSG preferred solution option:	Reject	
Publication of consultation response:	N/A	

#### E2: Xoserve' s Response

	Thank you for your representation.	
	As you've indicated, the UNC will be updated to clarify where the	
Xoserve Response	AQ correction process and specifically reason code 3 should be	
to Organisations	utilised and this will be as a result of Modification 0736.	
Comments:		
	As part of the Modification 0736 Workgroup development, the use	
	of AQ correction reason code 3, not as it was intended was	



discussed and deemed to have potential consequential impacts on Transporters and Shippers.
The changes delivered within XRN5237 are seeking to align with the proposal in UNC to prevent the use of AQ correction reason code 3 and avoid the consequential impacts of this.
Where you mention a part B solution, it is worth highlighting that discussions are occurring within the industry about a bigger review of the AQ correction processes. A part B to this change may only be required if the requirements remain the same following the AQ review. If the requirements change, we expect this will be picked up through another Change Proposal.
We will make sure your points a fed into the ChMC discussions.

#### E1: Organisation's preferred solution option

User Contact	Organisation:	SSE Energy Supply Ltd
	Name:	Megan Coventry
Details:	Email:	megan.coventry@sse.com
	Telephone:	02392277738
Organisation's		
preferred solution		
option, including	We support this change to provide clarity in the UNC around where a Shipper can utilise AQ correction reason code 3. Approve	
rationale taking into		
account costs, risks,		
resource etc.		
Implementation		
Date:		
Xoserve preferred		
solution option:	Approve	
DSG preferred		
solution option:	Approve	
Publication of		
consultation	N/A	
response:		

#### E2: Xoserve' s Response

	Xoserve Response to Organisations Comments:	
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#### E1: Organisation's preferred solution option

User Contact	Organisation:	Cadent
	Name:	Andy Clasper
Details:	Email:	andy.clasper@cadentgas.com
	Telephone:	07884113385
Organisation's preferred solution option, including rationale taking into account costs, risks, resource etc.	We are happy that the solution delivers on the intent of Modification	
Implementation Date:	Approve	
Xoserve preferred solution option:	Approve	
DSG preferred solution option:	Approve	
Publication of consultation response:	N/A	

#### E2: Xoserve' s Response

Xoserve Response	
to Organisations	final decision
Comments:	



# Section F: Approved Solution Option

#### **F1: Approved Solution Option**

FI. Approved 30		
XRN Reference:	XRN5237 Maintenance of a User relationship table for the purpose of AQ amendments (Modification 0736)	
Solution Details:	<ul> <li>Option 1 - CDSP hold the Shipper 'relationship table' to identify and prevent AQ corrections under reason code 3 where the submitting and previous Shipper are Affiliated as per Modification 0736.</li> <li>XRN5237 requires the following from a CDSP perspective: <ul> <li>Introduction of a Shipper 'relationship table' held by the CDSP and a process for Shippers to provide this information going forward</li> <li>Monthly identification of any AQ corrections submitted using reason code 3 where the registered Shipper is within the same group as per the 'relationship table' as the previous Shipper</li> <li>A communication process to contact relevant Shipper(s) who have submitted any AQ corrections identified within the above point</li> <li>In the absence of Shipper cancellation, the CDSP will cancel the identified AQ corrections</li> <li>Process to reverse AQ correction which should not have gone live as per the rules introduced under Modification 0736</li> </ul> </li> <li>SAP ISU: <ul> <li>An existing SAP report will be amended to enable the identification of AQ corrections submitted using reason code 3</li> <li>The report will also be amended to identify where an AQ correction cancellation has been submitted on requested sites</li> <li>The report will be amended to be triggered in line with the AQ corrections process timelines</li> </ul> </li> <li>Manual input: <ul> <li>Shippers identified as having submitted an AQ correction hwere they shouldn't as per Modification 0736 will need to be contacted via email to cancel their AQ correction. Please note Shippers may receive a BAU response (AQR file / C43 record) accepting the AQ correction however this information should be superseded by the receipt of an email asking for the AQ correction to be cancelled due to the Modification 0736 rules.</li> <li>In the absence of Shippers cancellation response (AQR file / C42 record), the CDSP will cancel on their behalf. Please note where the CDSP is required to cancel the AQ correction on the Shippers behalf, an unsolicited</li></ul></li></ul>	
Implementation Date:	Proposed January	
Approved By:	ChMC	
Арргочей ву.	Cilivic	



## **Section G: Change Pack**

#### **G1: Communication Detail**

Comm Reference:	2741.1 - RT - JR
Comm Title:	XRN5237 - Maintenance of a User relationship table for the purpose of AQ corrections (Modification 0736) – Detailed Design Change Pack
Comm Date:	14/12/2020

#### **G2: Change Representation**

Action Required:	For Representation
Close Out Date:	05/01/2021

#### **G3: Change Detail**

XRN5237 - Maintenance of a User relationship table for the		
purpose of AQ corrections (Modification 0736)		
Operational processes		
Shipper Users Distribution Network Operator (DNO) IGT		
Ellie Rogers Customer Change Specialist +441212292185 <u>ellie.rogers@xoserve.com</u>		
Uniform Network Code (UNC) <u>Modification 0736S - Clarificatory</u> <u>change to the AQ amendment process within TPD G2.3</u> has been raised to make a change to the AQ corrections process outlined in the UNC Transportation Principles Document Section G 2.3 (UNC TPD G2.3) in order to clarify the circumstances in which such corrections can be made. The UNC currently states the Registered User of a site may request a change in the Supply Point Annual Quantity (AQ) when the value does not reflect the expected consumption of gas over the following 12-month period. Currently, four 'eligible causes' (G2.3.21 & 22) exist which a User can utilise in order to justify the requirement for an AQ correction. The AQ Correction process was intended as an exceptions process and not designed to facilitate mass AQ changes. Based on this,		
Modification 0736 seeks to provide clarity in the UNC around where a Shipper can utilise AQ correction reason code 3. If implemented, Shippers should not submit an AQ correction utilising reason code		



3 if the previous Shipper is a 25% or more Affiliate with the current Shipper who is requesting the AQ correction.
Change Proposal XRN5237 has been raised to deliver the solution associated with Modification 0736 which involves the introduction of a Shipper Affiliate / Relationship table held by the CDSP, plus sets up the process to prevent invalid AQ corrections using reason code 3 as per Modification 0736 going live.
Link to XRN5237 Change Proposal
For the full Modification 0736 details, please see the link to the Joint Office website: <u>https://www.gasgovernance.co.uk/0736</u>
Please note Modification 0736 has not been approved yet and it is expected to be voted on by Panel on 17 December. If Panel reject Modification 0736, the solution proposed under this Change Pack will not be progressed. If Panel approve Modification 0736, implementation is expected to be as soon as possible following the Modification appeal window.
The implementation of this CP is anticipated to be immediately following January ChMC approval of the change which aligns with the proposed implementation of Modification 0736.

#### G4: Change Impact Assessment Dashboard (UK Link)

Functional:	None	
Non-Functional:	Operational processes	
Application:	SAP ISU (UK Link)	
User(s):	Shipper Users	
Documentation:	None	
Other:	Not Applicable	

Files				
File	Parent Record	Record	Data Attribute	Hierarchy or Format Agreed
N/A	N/A	N/A	N/A	N/A

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#### **G5: Change Design Description**

XRN5237 looks to introduce a Shipper Affiliate / Relationship table and a process to prevent invalid AQ corrections as per Modification 0736 going live.

This Change Pack will detail how the process is proposed to work and detail explicitly the impacts to Shipper Users.

Please note the solution proposed and approved by the December ChMC is predominantly manual to allow for immediate implementation which is anticipated following the decision on Modification 0736.

High level process overview and impacts

#### 1. Introduction of the Shipper Affiliate / Relationship table

As per Modification 0736 proposed legal text, all Shippers are required to notify the CDSP and confirm where no other Shipper User qualifies as a 25% Affiliate; or provide the identity of each other Shipper User who qualifies as a 25% Affiliate.

This information will be held by the CDSP in a Shipper Affiliate / Relationship table (outside of UK Link suite of systems) and will be used to assess whether an AQ correction utilising reason code 3 is invalid as per Modification 0736.

<u>Please note – if a Shipper does not notify the CDSP of their affiliates (this includes</u> <u>where no other Shipper User qualifies as a 25% Affiliate), the Shipper will be</u> <u>assumed as affiliated to all other Shippers and will not be able to utilise AQ</u> <u>correction reason code 3.</u>

Although the Modification is yet to be approved, we have written out to Shipper Contract Managers, to allow them to determine the relevant affiliate information for their organisation and submit this to the CDSP. This will enable us to have the correct information from the Modification/Solution implementation date in order to determine which AQ corrections are valid if the Modification is approved.

The information provided will be collated in the Shipper Affiliate / Relationship table and utilised on the Modification implementation date for the purpose of this solution.

Following the Modification decision at UNC Modification Panel on 17 December, if the Modification is approved, Shippers will be contacted again to provide their Affiliate position 5 days ahead of the Modification implementation date to ensure the latest information is reflected within the Shipper Affiliate / Relationship table for go live.

The Contract Manager for each registered Shipper on UK Link should receive a communication from the Xoserve Customer Life Cycle team, making them aware of Modification 0736 and requesting the Shipper organisation affiliation details. So please make every effort to provide the required information to the Customer Life Cycle team in the timelines specified.

#### 2. Monthly identification of invalid AQ corrections (as per Modification 0736)

• Following implementation of Modification 0736, the CDSP will monitor successfully submitted AQ corrections with a reason code of 3 each month.

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- As per the current process, M-15 is the deadline for an AQ correction to be submitted to the CDSP in order to go live on the first of the following month (M).
- Each month the CDSP will identify all the successfully submitted AQ corrections using reason code 3 within the deadline.
- For all successfully submitted AQ corrections using reason code 3, the CDSP will check these against the Shipper Affiliate / Relationship table to identify any that are to be deemed as invalid AQ corrections (as per Modification 0736). As detailed above, invalid AQ corrections using reason code 3 will be catagorised as such where the submitting Shipper is 25% or greater Affiliate to the previous Shipper as per the Shipper Affiliate / Relationship table held by the CDSP.

Please note, where a Shipper has not confirmed their Affiliate position with the Xoserve Customer Life Cycle Team as detailed within the step above, then any AQ correction reason code 3 submitted would be deemed invalid as per the Modification.

#### 3. Notification of invalid AQ corrections

1. If any successfully submitted AQ corrections are subsequently identified as being invalid, the CDSP will notify the Registered User (submitting Shipper) as soon as possible (expected to be M-14 or M-13 latest). Please note – this notification will be via an email communication and will be issued to the Shipper Contract Manager. If there is also an operational contact / box account within your organisation that you would like this notification to go to, please confirm this to the Customer Life Cycle team at the following box account customerlifecycle.spa@xoserve.com

In the absence of an operational contact, the notification will go to the Shipper Contract Manager.

2. The notification email will advise the Registered User of the invalid AQ correction as per Modification 0736 and request that the AQ correction is cancelled via the AQ correction cancellation file (AQI – AQ\_CORRECTION file format and C42 - AQ\_CORRECTION\_CANCELLATION record) by **M-11**.

#### 4. Cancellation of invalid AQ corrections

- 3. The CDSP will monitor the invalid AQ corrections identified under point 2 and check if an AQ correction cancellation (AQI / C42) has been submitted by the Registered User by the M-11 deadline.
- 4. If the Registered User has successfully submitted an AQ correction cancellation for any identified invalid AQ corrections as per Modification 0736, the value provided in the AQ correction will not go live and no further action will be required from the Registered User or the CDSP.
- 5. If the Registered User has not successfully submitted an AQ correction cancellation for the identified invalid AQ correction by the deadline, the CDSP will cancel the AQ correction on the Shippers behalf.
- 6. In this case, the CDSP will generate the AQI / C42 file format / record and load this into UK Link ahead of the AQ correction cancellation deadline which is **M-8**.
- 7. Please note, where the CDSP generate and load the AQ correction cancellation (AQI) on behalf of the Shipper, the Shipper will receive an unsolicited AQR correction response file (AQR - AQ CORRECTION RESPONSE file format and the C45 - AQ\_CORRECTION\_CAN\_RESPONSE record). This file will be triggered by the CDSP loading the AQ cancellation file within the system rather than from any Shipper action.
- 5. Reversal of invalid AQ corrections which have gone live In the situation whereby an invalid AQ correction, as per Modification 0736, goes live the AQ correction should be reversed.



Where an invalid AQ correction is identified to have incorrectly gone live, the CDSP will notify the Registered User, making them aware of this and request that the Shipper submits a subsequent AQ correction to reverse the position as a result of the invalid AQ correction going live.

The Shipper will be given a period of time to submit the subsequent AQ correction after which, if the Shipper has not successfully carried out the required action, the CDSP will submit the AQ correction on their behalf.

Again, in this scenario, where the CDSP generate and load the file on behalf of the Shipper, an unsolicited response will be sent to the Shipper. For an AQ correction it will be the AQR file format and the C43 - AQ\_CORRECTION\_RESPONSE record.

Once the subsequent AQ correction has gone live, the Capacity Charges will be adjusted to reflect the charges as if the invalid AQ correction had never occurred.

Please note – this element of the process is for the rare exception whereby an invalid AQ correction goes live and is not anticipated to be required frequently.

6. Ongoing maintenance of the Shipper Affiliate / Relationship table

As per the Modification 0736 legal text, the Shipper is responsible for notifying the CDSP where the Affiliate details held in the Shipper Affiliate / Relationship table change and must be updated.

Shippers are responsible for providing this notification to the Xoserve Customer Life Cycle team as soon as they become aware of a change.

This notification should be via email to the following box account: <a href="mailto:customerlifecycle.spa@xoserve.com">customerlifecycle.spa@xoserve.com</a>

Key things to note:

- Modification 0736 is awaiting formal approval from UNC Panel. This is expected on 17 December 2020. If the Modification is approved, implementation of this CP will be expected following the approval at the January ChMC.
- If approved, Modification 0736 will clearly state that using AQ correction code reason code 3 where the submitting Shipper is a 25% or greater Affiliate to the previous Shipper is invalid. Therefore, any AQ corrections submitted that have been deemed as invalid as per the above will be a breach of Code. Based on this, we are anticipating the process introduced under XRN5237 is an exceptions process which will not have to be used for a large volume of AQ corrections.
- As this process is predominantly manual, and we are making no changes to the current AQ correction systematised process, a Shipper may receive a system response to the AQ correction originally submitted which could confirm that the AQ correction has been accepted. This would be via the AQR file format and the C43 record. Please note – if a subsequent notification is received via email confirming that the AQ correction is invalid as per Modification 0736, this will supersede the system response which may have accepted the invalid AQ correction. Action will then need to be taken by the Registered User as per the process detailed above following



the receipt of the email communication notifying that an AQ correction is invalid.

- No formal reports are in scope of the initial implementation of this CP. The CDSP will be able to identify the Shippers which have submitted invalid AQ corrections and can provide this information if required.
- For initial implementation, the CDSP are not proposing to charge Shippers where the AQ correction cancellation has been submitted on their behalf. This is to avoid any delays in the implementation of the CP and due to the fact we are anticipating low volumes associated with this part of the process. Please note, it is possible that we will introduce a charge in the future if we deem appropriate to do so, for example, if volumes are very high and there are CDSP resource impacts.

#### **G6: Associated Changes**

Associated	Modification 0726 Clarificatory change to the AO amondment
Change(s) and	Modification 0736 - Clarificatory change to the AQ amendment process within TPD G2.3
Title(s):	

#### G7: DSG

Target DSG discussion date:	14/12/2020
Any further information:	DSG have already been made aware of this change and previously discussed the HLSO issued out in November. At the DSG meeting on 14 <sup>th</sup> December, members will be made aware that the Detailed Design Change Pack has been issued and will be encouraged to review it and provide any comments.

#### **G8: Implementation**

Target Release:	An ad-hoc release is expected. The actual delivery date is to be confirmed but expected to be following approval at the January ChMC to align with the Modification 0736 implementation date.
Status:	For Approval

Please see the following page for representation comments template; responses to uklink@xoserve.com



## Section H: Representation Response

#### H1: Change Representation

(To be completed by User and returned for response)

	Organisation:	EDF
User Contact	organisation.	
	Name:	Eleanor Laurence
Details:	Email:	eleanor.laurence@edfenergy.com
	Telephone:	07875117771
Representation Status:	Approve	
Representation Publication:	Publish	
Representation Comments:	We think this service should be chargeable immediately as we feel that would be a good incentive for parties to ensure issues are minimised. We also feel reporting should be developed for PAC to monitor non compliance with UNC rules. Also in the XRN document it says 'Although the Modification is yet to be approved, we have written out to Shipper Contract Managers, to allow them to determine the relevant affiliate information for their organisation and submit this to the CDSP. ' but we have received no contact as yet	
Confirm Target Release Date?	Yes	«h1_userDataAlternative»

#### H1: Xoserve' s Response

Xoserve Response to Organisations Comments:	Thank you for your response. In regards to charging Shippers where an AQ cancellation has been submitted on their behalf, as this is expected to be an exceptions process, we are not intending to charge immediately but this is something that will be considered should the volumes of these required cancellations exceed what is anticipated. At present, due to the fast implementation of the change following the Modification approval, setting up and applying charges may cause delays in this process which we want to avoid. As part of the initial implementation of Modification 0736, no formal PAC reports are in scope. It is worth highlighting that PAC do already receive information on AQ corrections submitted each month and the CDSP as part of the process will keep a record of where an invalid AQ correction has been identified and subsequently where the CDSP have to submit an AQ correction



cancellation on a Shippers behalf. If following implementation, a formal PAC report is required, this would be considered under a separate change.
In terms of the contact which has been made with Shipper Contract Managers, this has been sent to the registered Contract Manager for your organisation, however we have also forwarded the communication directly onto you for awareness. Apologies for any confusion with this but please let the Xoserve Customer Life Cycle team know if they need to change the registered Contract Manager contact for your organisation.

Please send the completed representation response to <u>uklink@xoserve.com</u>

#### H1: Change Representation

User Contact Details:	Organisation:	Northern Gas Networks	
	Name:	Helen Chandler	
	Email:	hchandler@northerngas.co.uk	
	Telephone:	07580704123	
Representation Status:	Support		
Representation Publication:	Publish		
Representation Comments:	Northern Gas Networks support this change; however we cannot comment on the Retro MOD0736A aspect, as that relates to MOD0746.		
Confirm Target Release Date?	Yes	«h1_userDataAlternative»	

#### H1: Xoserve' s Response

Xoserve Response	Thank you for your representation, we will feed this into ChMC for a
to Organisations	final decision
Comments:	

Please send the completed representation response to <u>uklink@xoserve.com</u>



#### H1: Change Representation

(To be completed by User and returned for response)

User Contact Details:	Organisation:	SSE Energy Supply Limited	
	Name:	Megan Coventry	
	Email:	megan.coventry@sse.com	
	Telephone:	02392277738	
Representation Status:	Support		
Representation Publication:	Publish		
Representation Comments:	We support this change to create a shipper affiliate/ relationship table to help check requests to use reason code 3 for AQ corrections.		
Confirm Target Release Date?	Yes	«h1_userDataAlternative»	

#### H1: Xoserve' s Response

Xoserve Response	Thank you for your representation, we will feed this into ChMC for a
to Organisations	final decision
Comments:	



## **Version Control**

#### **Document**

Version	Status	Date	Author(s)	Remarks
1.0	Approved	18/09/2020	Ellie Rogers	CP raised
2.0	With DSG	07/10/2020	Jai Le Resche	Updated with ChMC outcome from the meeting on 7 <sup>th</sup> October
3.0	With DSG	26/11/2020	Kate Lancaster	Updated to reflect decoupling of Modifications 736 and 736A
4.0	With DSG	02/12/2020	Chan Singh	CP updated with discussions from DSG 23 <sup>rd</sup> November 2020
5.0	For Approval	03/12/2020	Rachel Taggart	Solution Review Change pack added
6.0	Approved	11/12/2020	Rachel Taggart	Updated with ChMC outcome from the meeting on 9 <sup>th</sup> December 2020
7.0	For Approval	08/01/2021	Rachel Taggart	Detail Design Change pack added
8.0	Approved	20/01/2021	Rachel Taggart	Updated with ChMC outcome from the meeting on 13 <sup>th</sup> January 2021



## **Appendix 1**

#### **Change Prioritisation Variables**

Xoserve uses the following variables set for each and every change within the Xoserve Change Register, to derive the indicative benefit prioritisation score, which will be used in conjunction with the perceived delivery effort to aid conversations at the DSC ChMC and DSC Delivery Sub Groups to prioritise changes into all future minor and major releases.

Change Driver Type	CMA Order MOD / Ofgem
	EU Legislation     License Condition
	BEIS ChMC endorsed Change Proposal
	□ SPAA Change Proposal □ Additional or 3 <sup>rd</sup> Party Service Request
	□ Other (please provide details below)
Please select the customer	Shipper Impact
group(s) who would be impacted	□Xoserve Impact □National Grid Transmission Impact
if the change is not delivered Associated Change reference	Ν/Α
Number(s)	
Associated MOD Number(s)	Modification 0736/0736A
Perceived delivery effort	$\boxtimes 0 - 30$ $\square 30 - 60$
	□ 60 – 100 □ 100+ days
Does the project involve the	☐ Yes (If yes please answer the next question)
processing of personal data? 'Any information relating to an identifiable	🖾 No
person who can be directly or indirectly	Potentially no personal data, however we will be expected to hold and
identified in particular by reference to an identifier' – includes MPRNS.	maintain Shipper relationship data which could be perceived as
	commercially sensitive data.
A Data Protection Impact	□ New technology □ Vulnerable customer data □ Theft of Gas
Assessment (DPIA) will be	□ Mass data □ Xoserve employee data
required if the delivery of the	□ Fundamental changes to Xoserve business
change involves the processing of	□ Other (please provide details below)
personal data in any of the following scenarios:	
Tonowing scenarios.	(If any of the above boxes have been selected then please contact The Data Protection
	Officer (Kevin-Eltoft-Prest) to complete the DPIA. Kevin-Eltoft-Prest. Information can be found: https://xoserve.sharepoint.com/dept/tech/infosec/Documents/Forms/AllItems.aspx
Change Beneficiary	□ Multiple Market Participants
How many market participant or segments stand to benefit from the introduction of the	□ All industry UK Gas Market participants □ Xoserve Only
change?	One Market Group One Market Participant
Primary Impacted DSC Service	Service Area 1: Manage Supply Point Registrations
Area	
Number of Service Areas	□ All □ Five to Twenty □ Two to Five
Impacted	⊠ One
Change Improvement Scale?	□ High
How much work would be reduced for the customer if the change is implemented?	
	following at risk if the change is not delivered?



□ Safety of Supply at risk ⊠Customer(s) incurring financial loss □ Customer Switching at risk			
Are any of the following required if the change is delivered?			
	ed  Customer Testing Likely Required  Customer Training Required		
	own Impact to Systems / Processes		
Primary Application impacted			
	🗆 AMT 🛛 EFT 🖓 IX		
	Gemini Birst Other		
Business Process Impact	AQ SPA GRA		
	□Reads □Portal ⊠Invoicing		
	□ Other		
Are there any known impacts to	Yes (please provide details below)		
external services and/or systems			
as a result of delivery of this change?	⊠ No		
Please select customer group(s)			
who would be impacted if the	Shipper impact Network impact iGT impact		
change is not delivered.	□ Xoserve impact □ National Grid Transmission Impact		
	Vorkaround currently in operation?		
Is there a Workaround in operation?			
•	⊠ No		
If yes who is accountable for the workaround?			
	External Customer		
	Both Xoserve and External Customer		
What is the Frequency of the workaround?	N/A		
What is the lifespan for the	N/A		
workaround?			
What is the number of resource	N/A		
effort hours required to service workaround?			
What is the Complexity of the	Low (easy, repetitive, quick task, very little risk of human error)		
workaround?	☐ Medium (moderate difficult, requires some form of offline calculation, possible risk of		
	human error in determining outcome)		
	High (complicate task, time consuming, requires specialist resources, high risk of		
Change Prioritisation Score	human error in determining outcome) 15%		
onange rhonusation score			