Proposed Modifications to D+1 Business Rules

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QUESTION		COMMENT
Q1:	Should this process to address TOU meter errors be added to the D+1 business rules?	Yes – it is a big risk.
Q2:	Does the proposed TOU meter error test picks up relevant issues? Do you have any suggestions for improving the test?	Yes – but it could be improved by: • Also having a low-low check (i.e. that demand isn't <0), • If a retailer advises that the actual reading is wrong, replacing this with the model's estimate (rather than the retailer's estimate) to minimise the potential for data manipulation, and • Having a multiplier of 2x.
Q3:	Is the proposed multiplier appropriate?	No – what this rule should try and do is avoid shocks. One of our largest non-direct connect AG1 customers has the potential to take 4 TJ/d. A 5x multiplier would mean actual data could be 19 TJ (potentially wrong by 15 TJ) and still be accepted throughout the system. This would be material not just for us, but for other participants too. Even a 2-3 TJ variance is likely to be material depending on the retailer, emsTP spreads and the relevant BPP pool. This suggests a 1.25x multiplier might be best. As a compromise, a multiplier of 2x would seem to be the maximum. Anything more than this would limit the damage but not re-categorise the risk. The aim is to reduce the risk.
Q"4":	Is the 30 minute window a reasonable amount of time?	This question appears to have been included in error.

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Q4:	Do you think that the proposed modifications are a reasonable approach to dealing with 'real world' ICP shutdown issues? Do you think that the 0.5 and 100/GJ parameters are appropriate?	Yes and yes – but it is a compromise, a further workaround, and only a small incremental improvement. The risk that still remains is if AG1 or AG2 demand has to be estimated and the customer is at ½ rates, say, taking the 4 TJ customer above, this would still leave a potential 2 TJ/d suboptimal allocation during the maintenance period if there is also a problem with the meter. The proposed change to the D+1 business rules does not really address this. A more robust future-state D+1 embedded in the supply chain should automate these risks and a nominations regime could potentially be the answer.
Q5:	Do you have any suggestions for either improving the proposed modifications or alternative approaches for dealing with this ICP shutdown issue?	Yes – if the risk discussed above does occur, then, for the pilot scheme, the D+1 business rules should provide for the option for: • Retailers to raise the issue with the GIC, with supporting information from its customer, • GIC to manually amend value for that day (if time still permits) and future days in the maintenance period (but only if there is no meter data), and • Retailers to advise GIC of changes to information already supplied.
Q6:	Do you think that the proposed solution for estimating the gas consumption of a new AG2 ICP is reasonable?	Yes.
Q7:	Do you have any suggestions for either improving the proposed approach or for an alternative approach?	Yes – ideally the GIC should also require the retailer to provide some confirmation / discussion with the end-user to whom the nominations relate.
Q8:	Do you think that the proposed solution for estimating the gas consumption of an ICP that has had a permanent, step change in its gas consumption is reasonable?	Yes.
Q9:	Do you have any suggestions for either improving the proposed approach or for an alternative approach?	Yes – same answer as for question 7.
Q10:	Do you think the threshold for gate injection estimation should be raised to 5000 GJ?	No – the issue is essentially the same as the multiplier issue in question 2. Just because it might be a gas gate doesn't rule out that it might be an AG1 direct-connect customer.

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Q11:	Alternatively do you support the alternative approach where the 5000 GJ threshold is limited to morning and weekend D+1 runs with a lower limit of 3000 GJ for the weekday afternoon runs?	No – same answer as for question 10. Also, the morning and weekend runs are not relevant to afternoon run outputs – so focus should be placed on the afternoon runs.
Q12:	Apart from these two options are there any other approaches you propose for improving the automation of the D+1 algorithm while at the same time ensuring it is allocating gas as effectively as reasonably possible?	Yes – adopt the same principles as for question 2, and run with a compromise for the purposes of the pilot arrangement: a flat 2 TJ/d.
Also		References to Vector should be replaced with references to First Gas. It could then be clarified that the D+1 business rules only apply to the ex-Vector part of the First Gas transmission system.
And		There is also an issue about the number of sites that meter owners need to redial after the morning run. Wording improvements should be made to firm up how things have been working, e.g.: • The business rules only reference gate injection data, but should also reference consumption data under 'General' 2 • It should be clarified, under 'General' 2 that the afternoon run must wait for any final receipt of TOU telemetry data that was not provided in the morning run (if that data is being chased), or it can be run, but must be re-run if the TOU telemetry data does come through.