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APPENDIX A – DEROGATION APPLICATION

RECDER_01 - PROVISION OF METER TECHNICAL DETAILS AND METER ASSET PROVIDER (MAP) IDS TO THE CDSP

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ORGANISATION	RECCo
REC PARTY CATEGORY/ROLE	Other
DATE APPLICATION RECEIVED	5 October 2021

SUMMARY OF THE TRIAL AND RATIONALE FOR TRIAL
Under the Supply Point Administration Agreement (SPAA), a Change Proposal was implemented to require Gas Metering Equipment Managers to send Meter Technical Details and Meter Asset Provider (MAP) IDs with the Central Data Services Provider (CDSP). These changes were approved under SCP 496 (MAM to CDSP Update of MAP ID and MTD) and SCP 514 (Amendment to SCP 496 Implementation Approach), which require Gas MEMs to send this information to the CDSP from 8 November 2021. This provision is currently reflected in a 'sunrise' clause in the REC Metering Operations Schedule, which will take effect from 8 November 2021. The equivalent changes to the CDSP are being progressed through a Change Proposal in the Data Services Contract (DSC), under XRN4780 Part C. Under this Change Proposals, Gas MEMs will be able to send this file to the CDSP using a new Secure File Transfer Protocol (SFTP), to be hosted by Xoserve. XRN4780C was required as the Central Data Service Provider (CDSP) is required to provide the Meter Asset Provider Identity (MAP Id) to the Central Switching Service (CSS) via the Gas Retail Data Agent (GRDA). In order to do so the Meter Asset Manager must provide updates to the Meter Technical Details or MAP Id directly to the CDSP to supplement information received from Shippers. MEMs have reported that the details required to connect to the new SFTP haven't been made available by Xoserve in time to allow them to test and connect to this in time to send the required files from 8 November 2021. The first part of this derogation application (**Part A**) therefore requests a timebound derogation from sending the new files to the CDSP when the new obligation comes in on 8 November 2021. This is to allow Gas MEMs an appropriate amount of time to test and connect to the new SFTP, once the details have been made available. Xoserve currently expect these details to be made available to industry on 8 October 2021. The new obligation also requires MEMs to send the update by sending an 'ONJOB' file, which is an RGMA file that needs to be sent in RGMA format. There are some Gas MEMs in the market that don't use RGMA and may not have the systems and/or processes in place to send files in RGMA format. Formerly, under MAMCoP, a Change Proposal was raised (MAM CP 20 022 - Meter Technical Details from MAM to CDSP (non-RGMA)) to allow Gas MEMs to send an alternative, non-RGMA file instead of an ONJOB file. Although we understand this Change Proposal has general support amongst the MAMCoP board, it was not formally accepted due to a lack of quoracy when it came to a vote, and therefore is not currently recognised by the REC as a valid mechanism for meeting this obligation. However, the CDSP have already developed this file, and will be able to accept this format from Gas MEMs without any additional cost, other than those already incurred in the development to date. As sending either the RGMA file, or the alternative non-RGMA file, will allow a MEM to achieve the

outcome expected in the Metering Operations Schedule; the second part of this derogation application **(Part B)** requests that MEMs who wish to use the non-RGMA file can do so for a timebound period. This should allow the PAB time to review if the alternative file format should be allowed to continue, and added to the Metering Operations Schedule, or if all Gas MEMs should be required to send the ONJOB file in RGMA format.

SUMMARY OF PROPOSED DEROGRATION AND IMPACTED REC OBLIGATIONS

Part A – Temporary derogation for MEMs from sending Meter Technical Details and MAP ID details to the CDSP as required in Clause 6.4.10 and 6.4.13 in the Metering Operations Schedule. This requests a derogation of up to 2 months for MEMs who are not able to send the file due to the delay in the SFTP details being made available to them, to setup and test the connection.

Part B – Derogation for Gas MEMs from the requirement to use an ONJOB file to meet the obligation in Clause 6.4.10 and 6.4.13 in the Metering Operations Schedule. This requests that those MEMs that do not use RGMA are able to send the non-RGMA format file developed by the CDSP instead of the ONJOB file to meet this obligation, for an initial period of up to 6 months.

IMPACTED REC PARTIES, SERVICE PROVIDERS OR REC PROCESSES

This impacts all Gas MEMs and Xoserve as the Central Data Service Provider. This relates to the Meter Asset Installation process in the Metering Operations Schedule. The MAP ID is required by the CSS to provide notifications to the Meter Asset Provider (MAP) once the CSS goes live. This data item needs to be populated and maintained prior to the new switching arrangements coming into effect.

REQUESTED LENGTH OF TRIAL AND DEROGRATION PERIOD (TWO YEAR MAXIMUM)

Part A (derogation from obligation to allow time to complete SFTP connection) – proposed up to 2-month derogation from the current date of 8 November 2021, ending on 7 January 2022.

Part B (derogation to allow use of non-RGMA file) – proposed initial derogation period of 6 months, with a potential extension after the review if required to either provide notice of the requirement to use the RGMA file or for a Change Proposal to be progressed.

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ACTIONS / ACTIVITIES PLANNED DURING TRIAL PERIOD INCLUDING KEY MILESTONES AND DATES

Part A:
Gas MEMs who are unable to send files to the CDSP from 8 November 2021 due to the delay in the SFTP details being made available should ensure that prior to the expiry of the derogation, they:

1. Test and connect to the SFTP details provided by the CDSP;
2. Start sending the required files to the CDSP as set out in the Metering Operations Schedule; and
3. Continue to generate and store any files that can't be sent due to the delay in connecting to the SFTP; and
4. Contact the CDSP to agree a timetable and mechanism to send and process the backlog of files that couldn't be sent during the period of the derogation.
5. MEMs should continue to deliver all other requirements in the Metering Operations Schedule that are not in scope of this derogation, including sending Meter Technical Details and MAP IDs to the Supplier for these to be sent to the Shipper.

Part B:
Gas MEMs who are unable to send the ONJOB file to the CDSP, and wish to use the non-RGMA equivalent should notify the PAB (via the Code Manager) of their intention to do so and the reasons for this. This will allow the PAB to monitor the impacts of this alternative process during the derogation period, and contact impacted Parties as part of the review process.

ANY OTHER INFORMATION OR DOCUMENTATION TO SUPPORT APPLICATION

The non-RGMA file will be detailed as part of the UK Link Library under DSC governance and will not be detailed in the Data Specification. A copy of the file format has been included with this application.