

Subject	Gas (Downstream Reconciliation) Rules 2008 Guideline note rule 30.3 – flagging of estimates for allocation group 1 and 2 consumption data
Version	1.0
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1. Introduction

- 1.1 Rule 30.3 of the Gas (Downstream Reconciliation) Rules 2008 ('the Rules') sets out the requirement on retailers to provide their best estimate of consumption information for a consumer installation in allocation groups 1 and 2 to the allocation agent in instances when they are unable to provide actual daily energy quantities for the consumer installation.
- 1.2 The purpose of this guideline note is to clarify for allocation participants when they are to flag estimated consumption information provided to the allocation agent for allocation groups 1 and 2.
- 1.3 This note is explanatory in nature and is not legally binding. It needs to be read in conjunction with the Rules and the general approach set out in this note in no way reduces the requirement upon allocation participants to know and comply with their obligations under the Rules.

2. Background

- 2.1 Rules 29.4.1, 30.1, 31.1, 32.1 and 33.1 all place an obligation on retailers to provide the allocation agent with actual daily energy quantities for each consumer installation in allocation groups 1 and 2, from register readings or consumption recorded each day. These quantities must be provided to the allocation agent by:
 - (a) 0800 hours¹ on the fourth business day of the month that immediately follows the consumption period to which the information relates, for initial allocation;

¹ Until 30 April 2009, under the '[Gas \(Downstream Reconciliation\) Rules 2008 \(Exemption DR08-15 to 18-S: Injection information\) Notice 2008](#)', the deadline for the provision of information by retailers was extended by four hours for initial allocations until 1200 hours. This

- (b) 0800 hours on the ninth business day of the fourth month that follows the consumption period to which the information relates, for interim allocation; and
 - (c) 0800 hours on the 14th business day of the 13th month that follows the consumption period to which the information relates, for final allocation.
- 2.2 If for whatever reason a retailer is unable to provide the allocation agent with actual daily energy quantities for a consumer installation in allocation groups 1 and 2 per the requirement in rules 31.1, 32.1 and 33.1, then rule 30.3 applies. Specifically, in accordance with rule 30.3.1, a retailer must provide its best estimate of consumption information to the allocation agent, and advise the allocation agent of the fact that it is an estimate provided in accordance with rule 30.3.1.
- 2.3 Rule 30.3.2 also notes that compliance with rule 30.3.1 does not mean that the retailer has complied with the requirement to provide actual daily energy quantities.

3. Advising the allocation agent of estimated allocation group 1 or 2 consumption information

- 3.1 The rule 30.3.1 requirement to advise the allocation agent of estimated consumption information for a consumer installation in allocation groups 1 and 2 is the reason for the 'estimate indicator' field in the GAS050 file format determined by Gas Industry Co.²
- 3.2 It is important to note that the 'estimate indicator' field in the GAS050 applies, and therefore needs to be completed, for all allocation submissions (ie initial, interim, and final allocations³) for each day of a consumption period where the retailer has not been able to obtain actual daily quantities at a consumer installation.
- 3.3 So if, for example, the data for an allocation group 1 or 2 consumer installation is unrecoverable, then the retailer will need to provide its best estimate of consumption information to the allocation agent for not only the initial allocation undertaken for that consumption period, but also for the interim and final allocations (and as required, for any special allocations). In addition, for each allocation, the retailer will need to flag this estimated allocation group 1 or 2 consumption information in the GAS050 file.
- 3.4 When estimating allocation group 1 or 2 consumption information where any part of the metering equipment installed at a consumer installation is found to be in error, a retailer is to follow the requirements of rule 44.5 and the Schedule to the Rules. These set out correction criteria for metering errors and also describe the process to be adopted when no reliable data is

approach is continued until June 2009, under the [Gas \(Downstream Reconciliation\) Rules 2008 \(Urgent Exemption DR09-09-S: Injection Information\) Notice 2009](#).

² See '[Notice by the Industry Body \(Gas Industry Co\) under rule 25 of the Gas \(Downstream Reconciliation\) Rules 2008 specifying information exchange file formats](#)', version 1.2, dated 3 November 2008.

³ Including, as required, for any special allocations.

available to confirm the time period during which the device was in error or the amount by which it was in error.

4. Estimated consumption information for allocation groups 3, 4, 5, 6

- 4.1 For consumption information pertaining to allocation groups 3, 4, 5 and 6, the requirement under rules 31, 32 and 33 is for retailers to provide estimated energy quantities – subject to the meter reading and accuracy obligations under rules 26 to 30 and historic and forward estimate provisions in rules 34 to 37. Consumption information for these allocation groups will consist of a combination of forward estimates and historic estimates, calculated in accordance with those rules. Therefore, the ‘estimate indicator’ does not apply to allocation group 3 consumption information in the GAS050 file. Instead, the ‘Quantity of Historic Estimate’ field is to be used.

5. Validated register readings and permanent estimates

- 5.1 Rule 5 provides for ‘validated register readings’ to mean either a register reading or a permanent estimate which has passed an allocation participant’s validation process. However, it is important to note that, under the Rules, this definition is only relevant to consumption information for consumer installations in allocation groups 3, 4, 5 and 6 – see rules 29.4.3, 29.5, 35 and 36.
- 5.2 Under the Rules, the concept of validated register readings (including permanent estimates which have passed a validation process) is not relevant to the submission of consumption information for consumer installations in allocation groups 1 and 2. That concept is only relevant for the purpose of the Rules in respect of consumption information for non-TOU consumer installations – see rules 29.5, 34 and 35 – so as to address the frequency of meter readings, and the calculation of historic and forward estimates, for allocation groups 3 to 6.
- 5.3 Accordingly, actual register readings are required for allocation group 1 and 2 consumer installations. So, if an allocation participant must use a permanent estimate for a consumer installation in allocation group 1 or 2, then that allocation participant will need to flag this estimate in the GAS050 file for each of the initial, interim and final allocations (and, as required, for any special allocations).