

## Representation

### Draft Modification Report

#### 0427S: Estimated Opening Meter Reads Code Amendment

**Consultation close out date:** 02 November 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** RWEpower  
**Representative:** Edward Hunter  
**Date of Representation:** 01 November 2012

#### Do you support or oppose implementation?

Support

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

This modification seeks to align the UNC drafting with current process therefore removes any uncertainty from the code. It will remove any confusion around the period when Shippers are able to submit or resolve disputed opening meter reads.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

No

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

Yes

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

0427S

Representation

01 November 2012

Version 1.0

Page 1 of 2

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f) Promotion of efficiency in the implementation and administration of the Code.

This modification fulfils objective f.) by aligning the code with current practice therefore reflecting efficient administration.

d) Securing of effective competition:

(i) between relevant shippers;

(ii) between relevant suppliers; and/or

(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

An increase in the number of reads supplied by Shippers before an estimate is submitted may benefit the accuracy of industry settlement data. An unambiguous time period stated in the code in which to submit these may facilitate an increase in submitted actual reads.

### **Impacts and Costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

None

### **Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

As this process is already followed implementation can take place immediately following Authority approval.

### **Legal Text:**

*Are you satisfied that the legal text [and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://www.gasgovernance.co.uk/proposedACS))] will deliver the intent of the modification?*

Yes

### **Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

No