

Representation

Draft Modification Report

0466 0466A - Daily Meter Reading Simplification (with improved within day data provision)

Consultation close out date: 06 November 2014

Respond to: enquiries@gasgovernance.co.uk

Organisation: British Gas Trading Ltd

Representative: Andrew Margan

Date of Representation: 06 November 2014

Do you support or oppose implementation?

0466 - Oppose

0466A - Oppose

If either 0466 or 0466A were to be implemented, which would be your preference?

Prefer 0466A

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

Mod 0466

Ahead of Nexus we believe that all parties should be ensuring data quality within the gas industry improves. We are concerned that this modification lowers the requirement and the liabilities for Transporters to send Daily Meter Reads, which could have a detrimental impact on Daily Read information. Rather than reduce the liabilities, we believe liabilities should increase to incentivise the improvement of Daily Meter Read data quality. Therefore we do not support this proposal.

Mod 0466A

As per the above we have concerns that this modification lowers the requirement and the liabilities for Transporters to send Daily Meter Reads, which could have a detrimental impact on Daily Read information quality. As this alternate places an obligation on Transporters to make available "within day" data to users when requested, this may mitigate some of the data quality concerns, but as this does not guarantee improvements in data quality. Therefore we do not support implementation.

Modification Panel Members have indicated that it would be particularly helpful if the following question(s) could be addressed in responses:

How many sites are likely to take up the service?

We have not identified any customers who require this service.

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

0466/0466A

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None identified

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

As both proposals will reduce the burden on Transporters to procure and process Daily Meter Readings and this will make the process more efficient this proposal could be expected to facilitate relevant objective f) promotion of efficiency in the implementation and administration of the Code.

Impacts and Costs:

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

IS and process changes will be required to Forecasting and Trading Desk systems, which may effect NDM forecast accuracy for our day ahead position.

Implementation:

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

As system changes are required and due to the unprecedented volume of industry change, we require a minimum of six months implementation for these proposals.

Legal Text:

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

No issues identified

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