

Representation - Draft Modification Reports

UNC 0633 - Mandate monthly read submission for Smart and AMR sites from 01 December 2017

UNC 0638 - Mandate monthly read submission for Smart and AMR sites from 01 April 2018

Responses invited by: 5pm on 20 November 2017

To: enquiries@gasgovernance.co.uk

Representative:	Edward Hunter
Organisation:	extraenergy
Date of Representation:	20 th November 2017
Support or oppose implementation?	0633 - Oppose 0638- Support
Preference:	<i>If either 0633 or 0638 were to be implemented, which would be your preference?</i> 0638
Relevant Objective:	d) 0638 – Positive 0633 - negative

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

Modification 0638 aligns monthly meter reading for AMR and Smart meters with the direction put in place by the CMA. This was an agreed date that industry parties have been working towards. In our view it is unacceptable to move the goal posts at such a late stage in reaction to a perception that it will improve the level of UIG when there is no clear evidence that this is the case. UIG is complex in nature and an increased number of meter reads may only serve to highlight the volume of UIG rather than “solve” it.

By bringing forward these timescales modification 0633 serves to increase industry costs and therefore consumer costs, noting that a solution mandating Smart meter reads is significantly more onerous upon domestic Shippers given the number of meter points and therefore size of project required.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

Original lead time for 1st April delivery as proposed by the CMA and agreed by the industry.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

We are unable to provide costs other than to acknowledge that a 1st December 2017 implementation would increase costs significantly and is highly impractical given the re-planning and reallocation of limited resource.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

We are satisfied that it achieves the intent of the modification.

Modification Panel Members have requested that the following questions are addressed:

Q1: Is this proposal inconsistent with the CMA requirement?

The proposals are consistent with the CMA requirement in terms of intent, however reducing timescales to achieve this as modification 0633 does we believe is not.

Q2: Do you believe there are any implications and/or consequential impacts that this proposal might have on Transporters' "must read" obligations?

We note that Cadent has provided assurances to the industry that any changes to the must read process will be fully consulted on.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

None noted.

Please provide below any additional analysis or information to support your representation

No additional analysis or information identified.