

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:	Robert Cameron-Higgs
Organisation:	Flow Energy
Date of Representation:	20/11/17
Support or oppose implementation?	0633 – Comments 0638- Support
Preference:	<i>If either 0633 or 0638 were to be implemented, which would be your preference?</i> 0638
Relevant Objective:	d) Positive * <i>delete as appropriate</i>

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

The evidence to support an earlier implementation (0633) is predicated on those reads improving settlement accuracy and as a consequence the level of UIG falling. This aspiration and desire must be evidenced based however and then balanced against known increased costs and risks that an earlier implementation may bring. Previous consultations in this area have made it clear that shipper organisations plan and schedule system changes and releases a number of months in advance. Moving from an April 2018 date to December 2017 date, maybe achievable for a proportion of those sites captured by the legal text, but this may not be the case for all shipper organisations based on their systems and existing processes

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

Retention of 1 April 2018

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

Costing a December 2017 release has not been achievable to date, but it is likely that areas of non-compliance would result if 1 December was sanctioned as the effective date

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

Not fully considered, however if December was selected we believe the text would benefit from a 'where reads are available' clause until April 2018.

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

Q1: Is this proposal inconsistent with the CMA requirement?

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 have confirmed they will consult on Must Read obligations being considered re this area. Any potential changes should only be assessed for a post April 2018 period

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.*

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