

## 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](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Kirsty Dudley
<b>Organisation:</b>	E.ON
<b>Date of Representation:</b>	20/11/2017
<b>Support or oppose implementation?</b>	0633 – Oppose 0638 – Qualified Support
<b>Preference:</b>	<i>If either 0633 or 0638 were to be implemented, which would be your preference?</i>  0638
<b>Relevant Objective:</b>	d) Positive

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

Although the same solution has been proposed for both options there are two different dates for implementation, one cannot be met due to the modification process and the other aligns with the CMA Order, we support alignment with the CMA order out of the two.

We are fully understanding and engaged with trying to resolve the current UIG issues and we agree it is potentially due to lots of little issues over multiple modifications, however, none proposed are a silver bullet, including this one and we do not perceive the benefits to be those proposed based on our MI or feedback at the recently UIG meetings do we do not believe there are benefits of accelerated implementation which 0633 proposes.

We also note that the legal text only focusses on AQs >293,000 kWh, however, our reading of the CMA order does not mirror these exclusions which we believe they should. This is the reason for our qualified support of 0638.

Finally, depending on the date the Authority makes a decision and proposes a date it could leave only a matter of weeks between the dates proposed on 0633 and 0638.

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

At least 3 months as some system enhancements are required or aligned with the CMA date.

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

Small change IT costs.

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

5.9.1(d) refers to Advanced Meters but all other clauses (5.9.1(a), 5.9.1(b)(iii), 5.9.2) refer to Advanced Supply Meter – should these be Advanced Meter and be consistent?

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

*Q1: Is this proposal inconsistent with the CMA requirement?*

It seeks to implement prior to the date explicitly referenced in the order, also the CMA Order does not include the threshold of 293,000kWh which this legal text does, which sees the mod seeking to implement only a selection of supplies in comparison to the intent of the order, we would prefer the legal text mirrored the obligations.

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

There may be impacts but we have been unable to quantify either way.

**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.*

No.

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

NA