



Bob Fletcher
Joint Office of Gas Transporters
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20 November 2017

Dear Joint Office,

Re: UNC Modification Proposals 0633 and 0638

Thank you for the opportunity to provide representation on the above noted Modification Proposals. Please find below NGN's comments in respect of these Modifications.

NGN supports both Modification proposals with a preference for UNC0638.

Reasons for Support/Opposition:

We support both modification proposals as either would further the objectives set out in the CMA Gas Settlement Order 2016 regarding the mandating of monthly read submissions. We also agree that more readings being submitted would improve settlement accuracy. Our preference for UNC0638 is driven by our belief that a reasonable lead time may be required for some parties to be able to comply with the requirement.

Self-Governance Statement:

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

Yes, we agree that an authority decision should be sought regarding these modifications.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that these modifications would further Relevant Objective (d), the securing of effective competition, due to the impact they could have on settlement accuracy.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes, we believe that the legal text provided delivers the solutions set out in the modifications.



Errors or Omissions in the Modification Report:

None

Any additional comments:

NGN would like to raise a point for consideration regarding the interoperability of early smart meters following a change of Supplier event. We understand that not all Suppliers are able to connect to, and obtain reads from, other Suppliers' smart meters. This may have the effect of reverting the smart meter to acting as a traditional meter or lead suppliers to exchange the existing smart meter for another that they can remotely access. In the event of these meters being required to be monthly read this could have detrimental effect on the ability of shippers to comply with the meter read frequency.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'SKey', written in a cursive style.

Shanna Key
Industry Codes Officer