

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:	Tim Hammond
Organisation:	Corona Energy
Date of Representation:	16/11/17
Support or oppose implementation?	0633 - Support 0638 - Oppose
Preference:	<i>If either 0633 or 0638 were to be implemented, which would be your preference?</i> 0633
Relevant Objective:	d) Positive (for 0633)

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

As proposer Corona Energy (CE) support UNC modification 0633 (to mandate monthly read submission for SMART and AMR sites from 1 December 2017) because it remains an effective implementation date for the CMA remedy.

UNC modification 0633 allows for more consumption data for various industry processes and will help ease Unidentified Gas (UIG) and reduced scaling factor volatility as well as improve gas settlement accuracy for shippers sooner than British Gas's UNC modification 0638.

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

CE agree with the amended timetable proposal for UNC modification 0633 (0638).

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

No implementation costs.

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

We have reviewed the legal text to amend section M.5.9.1 and M.5.9.2

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

Q1: Is this proposal inconsistent with the CMA requirement?

No. When the CMA requirement was made unidentified gas (UIG) was not a significant concern to shippers.

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

No. We do not see any impact on must-read obligations for Smart or AMR.

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

None provided.