

## 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)

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|--|---|
| <b>Representative:</b>                   | Andy Knowles  |
| <b>Organisation:</b>                     | Utilita Ltd   |
| <b>Date of Representation:</b>           | 14 <sup>th</sup> November 2017  |
| <b>Support or oppose implementation?</b> | 0633 - Oppose * <i>delete as appropriate</i><br>0638- Support * <i>delete as appropriate</i>                                |
| <b>Preference:</b>                       | <i>If either 0633 or 0638 were to be implemented, which would be your preference?</i><br>0638* <i>delete as appropriate</i> |
| <b>Relevant Objective:</b>               | <b>d) Positive</b> * <i>delete as appropriate</i>   |

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

Overall, we are supportive of measures to improve the efficiency of the gas settlement processes and believe increasing the provision of Meter Reads to the CDSP on a monthly basis will lead to greater accuracy of AQs and potential reductions in Unidentified Gas (UIG) volatility. We however have concerns with the proposed implementation date of Modification 0633 of 01 December 2017 due to business arrangements already being in place for the setting of the AQ for capacity in December.

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

We believe Modification should be implemented on 01 April 2018 in line with the CMA's requirement. Where Modification 0633 was implemented on 01 December 2017 we would not have time to prepare commercially for the likely changes in AQ.

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

Going forward we will need to assess the way in which this change will impact our AQ's. As previously mentioned we believe an April 2018 opposed to Dec 2017 will allow

industry time to prepare for these changes with potentially significant commercial impacts.

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

Utilita is satisfied with the proposed legal text of both Modifications which are both identical apart from the proposed implementation dates. We also view that the provided wording meets the intent of both Modifications.

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

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

No, we believe the modifications drafting support the intentions of 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 are not concerned with any implications or consequential impacts that either Modification has 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.