

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:	David Mitchell
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	20/11/17
Support or oppose implementation?	0633 - Support 0638 - Support
Preference:	<i>If either 0633 or 0638 were to be implemented, which would be your preference?</i> No preference
Relevant Objective:	d) Positive

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

SGN supports Modifications 0633 and 0638 as they will improve the frequency of Meter Reading submission to the CDSP from sites at which Smart or AMR is present, in accordance with the CMA Energy Market Investigation (Gas Settlement Order) 2016.

With regards the specific implementation date, and therefore the preference of one modification over the other, we would defer to Shipper guidance as to the most efficient and suitable timescales.

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

As above, we would follow the Shipping community's recommendations as to the most appropriate implementation timescales, although we note that implementation must occur by 1st April 2018 to ensure compliance with the CMA's order.

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

None identified.

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

Yes.

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

Q1: Is this proposal inconsistent with the CMA requirement?

We believe both Modifications would appropriately discharge the intentions of the CMA's order.

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

We do not consider that either modification has a direct impact on the provision of must reads.

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

N/A.