

Joint Office  
[enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

27 April 2020

Dear Sir or Madam,

**Re: 0722U Allow Users to submit Estimated Meter Reading during COVID-19**

Thank you for the opportunity to provide representation on the above noted Urgent Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

**NGN Supports this Urgent Modification Proposal.**

**Reason for support/opposition:**

Please summarise (in one paragraph) the key reason(s)

This proposal should further Relevant Objective d) *Securing of effective competition* by allowing sites to submit Estimated Meter Readings in instances where an Actual Meter Reading is unable to be obtained due to the COVID-19 period restrictions, thus allowing reconciliation and AQ calculations to continue as normal and ensuring allocations are as accurate as possible.

We support this as being a solution where the submission of a consumer provided read is not a viable option.

**Implementation:**

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

This proposal could be implemented as soon as Ofgem approval is received, subject to no appeal being raised.

**Impacts and Costs:**

What analysis, development and ongoing costs would you face?

In the short to medium term, this modification has no more of an impact than the current situation, where reads are not able to be provided.

**Legal Text:**

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

We believe the legal text provided should deliver the Solution set out in the modification.

**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.

None identified.

**Smell gas?**

Call the National Gas Emergency  
Service on 0800 111 999



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Thorpe Park Business Park  
Colton, Leeds LS15 8TU



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

We would hope that the Performance Assurance Committee (PAC) would introduce monitoring of uptake and effectiveness of this modification. We would also encourage there to be additional monitoring as to the volume and timing of actual reads being received after the end of the relevant COVID-19 period.

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,

Tracey Saunders (via email)  
Market Services Manager (Industry Codes)  
Mobile: 07580 215 743

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