

Representation - Modification UNC 0722 (Urgent)

Allow Users to submit Estimated Meter Reading during COVID-19

Responses invited by: **1pm on 27 April 2020**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	27 th April 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We support this modification as it allows Shippers to provide estimated meter readings in place of actuals. Assuming that the estimates are accurate then this should result in more rapid accurate reconciliation of energy and re-estimation of rolling AQs that then feed into more accurate allocation of energy. It therefore furthers relevant objective (d) Competition between Shippers.

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

This can be implemented immediately following an Ofgem direction.

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

This modification is not making any system changes and consequently Xoserve will not be able to identify which meter readings are actual meter readings and which are estimated meter readings. We expect the Performance Assurance Committee to carefully monitor the use of the modification if it is implemented and monitor the reasons why the estimated meter reading is reasonable to ensure that the process is not abused.

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

We are aware that NGN are continuing discussions with the legal text provider regarding which legislation should be the referenced.

We would like to record our appreciation to NGN for delivering the legal text in very short timescales.

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.*

Not applicable as this was an urgent modification.

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