

## Representation

### Draft Modification Report

#### 0466 0466A - Daily Meter Reading Simplification (with improved within day data provision)

**Consultation close out date:** 06 November 2014

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** Northern Gas Networks

**Representative:** Alex Ross-Shaw

**Date of Representation:** 6 November 2014

#### Do you support or oppose implementation?

0466 - Support

0466A - Support

#### If either 0466 or 0466A were to be implemented, which would be your preference?

Prefer 0466

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

We support the proposals aims in updating the rules for Daily Metered Sites, which as stated in the Draft Modification Report, have not been amended since the implementation of the original Network Code in 1996.

The proposed rules will allow for more cost effective meter reading service provision by Transporters.

We support the proposer of 0466 in opening up 'within day' data to competition, hence our preference for 0466.

#### Modification Panel Members have indicated that it would be particularly helpful if the following question(s) could be addressed in responses:

##### How many sites are likely to take up the service?

N/A

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

No.

#### Relevant Objectives:

0466/0466A

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*How would implementation of this modification impact the relevant objectives?*

We agree with the Draft Modification Report that states both proposals would further  
f) promotion of efficiency in the implementation and administration of the code.

**Impacts and Costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

We agree with the User Pays costs outlined in the Draft Modification Report.

**Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

We agree with the proposer that the implementation timetable will depend on system changes.

**Legal Text:**

*Are you satisfied that the legal text and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://www.gasgovernance.co.uk/proposedACS)) will deliver the intent of the modification?*

Yes.

**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

No.

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,



Alex Ross-Shaw

Network Code Officer