

## Representation Draft Modification Report

### Modification 0466 / 0466A: Daily Meter Reading Simplification

1. **Consultation close out date:** 6<sup>th</sup> November 2014
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:** Gazprom Energy  
Bauhaus, 5<sup>th</sup> Floor  
27 Quay Street  
Manchester
4. **Representative:** Steve Mulinganie  
Regulation Manager  
[stevemulinganie@gazprom-mt.com](mailto:stevemulinganie@gazprom-mt.com)  
07590 245 256
5. **Date of Representation:** 6<sup>th</sup> November 2014
6. **Do you support or oppose Implementation:**  
We **Support** implementation of Modification 0466A  
We **Oppose** implementation of Modification 0466

**If either 0466 or 0466A were to be implemented, which would be your preference?**  
We prefer 0466A

7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
We believe modification 0466A provides protection for parties who are subject to the monopoly provision of DM services by Transporters. Under licence parties are required to provide hourly meter reads to larger customers, if requested, on D+1 and as the providers of the monopoly DM services it is appropriate to ensure that Transporters are required to provide this service if requested. This avoids the inefficient requirement to install additional equipment at sites to procure this information when the in situ equipment, which parties are mandated to pay for, is readily able to provide the relevant information.

**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?**  
We have not undertaken this analysis at this time

**8. Are there any new or additional Issues for the Modification Report:**

No

**9. Self-Governance Statement Do you agree with the status?**

Not applicable

**10. Relevant Objectives:**

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

We agree with the proposers that 0466 & 0466A is positive in respect of relevant objective (f)

**11. Impacts & Costs:**

*What analysis, development and on-going costs would you face if this modification was implemented?*

We have not identified any material costs associated with 0466A.

**12. Implementation:**

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

We note that no implementation date has been proposed however we would assume implementation would now be post Nexus implementation.

**13. Legal Text:**

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

We have not reviewed the Legal Text provided.

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

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

No.