

Representation

Draft Modification Report

0487VS - Introduction of an Advanced Meter Reader (AMR) Service Provider (ASP) Identifier (ASP ID) and Advanced Meter Indicator

Consultation close out date: 06 November 2014

Respond to: enquiries@gasgovernance.co.uk

Organisation: Wales & West Utilities Ltd.

Representative: Richard Pomroy

Date of Representation: 07 November 2014

The consultation is aimed at establishing if the content/effect of the variation have caused you to change a view that you previously expressed, or to take a view that you had not previously considered. Please note any representation received in respect of Modification 0487S will be carried forward should parties not wish to change their original representation.

Do you support or oppose implementation?

Support

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

0487VS extends the scope of 0487S to be enduring beyond NEXUS go live and therefore we support 0487VS. Our concern with 0487S was that there was likely to only a limited period of operation before NEXUS go live and it was not clear that its development was efficient use of resources. We note the benefits to suppliers of storing the proposed information in central systems but we are concerned about the lack of data validation and the requirement to populate the information when Users become aware of it which effectively makes this optional. We recognise that Suppliers are keen to support the population of this information and that proposals are being put forward under SPAA to require this information to be recorded, nevertheless based on past experience we are concerned that data quality in central systems that is provided by Shippers may not be as good as intended regardless of obligations placed on Suppliers by other governance arrangements.

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

None

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

No, we now think that this should not be self-governance. WWU voted in favour of self-governance at the October modification panel because we took the view that as the legal text effectively

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makes compliance with 0487VS optional we did not believe that there is a compliance issue. We have subsequently had further discussion with EDF, who opposed 0487S, and we think that their arguments are sufficiently important that in the interests of good governance the UNC modification panel should reconsider self governance.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

It would support relevant objective (d) securing effective competition between suppliers although with the caveat that we believe that more robust requirements around data quality would enhance the impact on this relevant objective.

Impacts and Costs:

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

N/A

Implementation:

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

The lead time needs to allow affected parties sufficient time to make system changes

Legal Text:

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

The legal text is consistent with the intent of the modification.

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.

It is unclear what happens in the following circumstances: a supplier appoints an ASP and there another ASP's equipment in place so the supplier populates the ASP id with its service provider; the supplier then de-appoints its ASP. The supplier will remove its ASP id but it is unclear whether it replaces it with the customer's ASP id because it may not be certain whether the other ASP still has equipment on site. Different Suppliers and Shippers may take different approaches to this situation, one assuming that without positive proof then it should assume nothing is in place and another assuming that since they had no information to the contrary then they should assume that the customer's ASP equipment is still in place. This could lead to inconsistencies between Shippers in how data is recorded compared to what is on site.