

## 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:** WINGAS UK Ltd

**Representative:** Rob Johnson

**Date of Representation:** 30 October 2014

#### Do you support or oppose implementation?

0466 – Oppose.

0466A – Support.

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

Prefer 0466A.

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

WINGAS UK is pleased to have the opportunity to respond to this consultation phase of the modification. As WINGAS UK Ltd is the proposer of 0466A, we concur with the majority of the modification 0466 but in the current climate of increased quality, volumes and availability of data in the gas industry, we are perplexed as to why 0466 proposes to curtail the provision of within day data via the DM meter reading service.

Furthermore, we would like to stress that as yet a logger that provides within day reads at the frequency currently available from DM loggers (every four hours) is not yet available commercially to shippers, making the current service functionally irreplaceable (AMR loggers record within day data, but currently only send data once per day). Removal of this service would mean a loss of this functionality to these customers.

Lastly, as a supplier we also have a licence obligation to have the facility to receive hourly data from these sites and provide it to their customers if requested. Should this service be withdrawn under 0466, alternative measures would have to be taken which raises the possibility of interruptions to the data and therefore breaches of our license conditions.

Our alternative proposal seeks to improve the existing service rather than diminish it, creating a service whereby the data provided can be much more easily migrated into systems and used to accurately balance customer's positions within day, which in turn naturally can be used to the customer's benefit and reduce the risk that a breach of SOQ can occur.

0466/0466A

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**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?**

WINGAS UK Ltd will elect to receive within day data via the proposed method for its entire DM portfolio. WINGAS supplies 2% of the total non-domestic market, approximately half of that is daily read.

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

No.

**Relevant Objectives:**

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

Whilst we agree both Modification Proposals would enable Transporters to provide a more efficient and cost effective Meter Reading service for Daily Metered Supply Points subjected to the Daily Read Requirement, the removal of within day read provision would inhibit our ability to effectively discharge our supplier licence condition.

**Impacts and Costs:**

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

If the alternate version is implemented, aside from the user pays costs and one off fee to release the data via the IX transfer protocol as described in the workgroup report, WINGAS UK will need to upgrade some of its systems to accommodate the influx of within day data via the IX.

Should the original modification be implemented then an exercise to install AMR throughout our DM portfolio would be necessary, which will create significant costs which will be passed through to the customer.

**Implementation:**

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

We see no reason as to why this modification cannot be implemented as soon as is practicable.

**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?*

We have not reviewed the legal text for modification 0466. As the proposer of UNC Modification 0466A we have not identified any problems with the legal text for the alternate 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.*

No.