

Representation

Draft Modification Report

0487S - Introduction of Advanced Meter Indicator and Advanced Meter Reader (AMR) Service Provider Identifier in advance of Project Nexus Go Live

Consultation close out date: 08 October 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: WINGAS UK Ltd
Representative: Rob Johnson
Date of Representation: 06th September 2014

Do you support or oppose implementation?

Support

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

WINGAS UK Supports implementation of this modification as it decreases the disruption to AMR services already in place caused by delays in appointment of the incumbent ASP through the change of supplier process. We also see benefits in the facility to identify dumb or advanced meters which will assist in compliance with our obligations in rolling our advance meter installations. We also agree that this in general improves the customer experience and that it reduces the chances that unnecessary duplicate installations of AMR could occur to the expense of the customer.

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

Q1: "Respondents to indicate, recognising the solution only applies pre nexus, their expected systems implementation lead time for this modification should it be implemented, to help Panel consider the merits of this modification."

As the specific method of how a shipper will update this information has yet to be defined our response to this question has to be ambiguous. If the chosen method of updating the ASP field was to be via an automated solution the lead time to enhance our systems would be necessary.

Any implementation requiring systems changes would require a lead time of 6 months.

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

No.

Self Governance Statement:

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

Yes.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that this has a positive impact for section 4d) in the relative objectives.

Impacts and Costs:

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

Again, as the specific method of how a shipper will update this information has yet to be defined our response to this question has to be ambiguous. If the chosen method of updating the ASP field was to be via an automated solution then in consideration of the size of WINGAS UK's portfolio then the costs would likely be to disproportionate to the benefits achieved.

If the UK Link committee opted for a more manual process then the costs would be likely to be much more proportionate.

Implementation:

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

Six months.

Legal Text:

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

We have not reviewed the legal text.

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.

We appreciate that the issue of primacy has already been addressed within the text of the modification but ideally we would like to see a future improvement where any ASP that has a device installed at a given site could be given equal visibility in industry data.