

Representation Draft Modification Report

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

1. **Consultation close out date:** 6th November 2014
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:**
Gazprom Energy
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27 Quay Street
Manchester
4. **Representative:**
Steve Mulinganie
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5. **Date of Representation:** 6th November 2014
6. **Do you support or oppose Implementation:**
We **Support** implementation
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
We raised the modification to address issues occurring on Change of Supplier (CoS) with the new Supplier being unable to identify if the in-situ meter is Advanced and if so who is the current Advanced Meter Reading Service Provider (ASP). With hundreds of thousands of advanced meters already in-situ this proposal will provide critical information which will enable the new Shipper & Supplier to more efficiently manage the CoS process for customers with advanced meters. Additionally the proposal identifies if the in-situ Meter is Advanced or Dumb and thus aides the Supplier in complying with their obligations to ensure relevant meters are advanced.

For the avoidance of doubt our modification does not dictate the method for achieving the introduction of the Advanced Meter Reader (AMR) Service Provider (ASP) Identifier (ASP ID) and Advanced Meter Indicator.
8. **Are there any new or additional Issues for the Modification Report:**
No.

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

Yes

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Centralising the relevant information will improve the CoS process by ensuring the new Shipper and Supplier has ready access to the Advanced Meter Reader (AMR) Service Provider (ASP) Identifier (ASP ID) and Advanced Meter Indicator. This enables the new Shipper and Supplier to efficiently make the necessary arrangements in relation to the site and will therefore further relevant object d) securing of effective competition by the reduction in abortive visit costs.

11. Impacts & Costs:

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

We will incur minor costs in developing systems and processes pre Nexus. The post Nexus solution will be supported as part of our wider Nexus project.

12. Implementation:

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

We would like to see the modification implemented as soon as reasonably practicable

Recognising concerns raised over the timeline for implementation and any reduction in the benefits case from a delayed implementation we believe it is important when determining the “cost benefit” of the proposal in relation to pre Nexus delivery to understand that the benefit is not equal for each month from implementation.

The visibility of the ASP ID will be of principle benefit during annual contract renewals and in our experience the majority of relevant sites in the non-domestic market (50% to 66%) come up for renewal around the start of the Gas Year (1st October). For the avoidance of doubt, for October 2015 renewal rounds, Shippers will be nominating and confirming in pre NEXUS i.e. in advance of 1st October 2015 proposed implementation of project Nexus.

Therefore even if implementation is delayed slightly the **majority of the benefit** arising from the proposal will be back loaded towards Q2/Q3 of 2015.

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.