

## 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:** Wales & West Utilities Limited  
**Representative:** Richard Pomroy  
**Date of Representation:** 7 November 2014

#### Do you support or oppose implementation?

0466 - Support \* *delete as appropriate*

0466A - Comments\* *delete as appropriate*

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

Prefer 0466 *delete as appropriate*

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

Both 0466 and 0466A seek to change the DM regime and in our view the common elements offer significant benefits. The modification proposals differ in the way within day reads which the Transporter can choose to collect are provided to Shippers. While the provision of the IX solution in 0466A is User Pays we are not currently able to support 0466A as it is not clear whether this service will be utilised and we do not believe that it is efficient use of Xoserve resources to develop a new service unless there is evidence that this service will be utilised as happened with modification 0224 Daily Metered Elective. Our decision on whether or not to support 0466A will depend on responses to the question asked as part of the consultation "How many sites are likely to take up the service?"

#### 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?

Not applicable for WWU

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

No

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### Relevant Objectives:

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

We believe that both 0466 and 0466A would positively impact objective f) Promotion of efficiency in the implementation and administration of the Code

### Impacts and Costs:

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

We would need to develop the appropriate terms and conditions and analysis of possible charges.

### Implementation:

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

We agree that the implementation date is a matter for the UNC Committee.

### 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?*

While there is nothing intrinsically wrong with the legal text we think that it could be improved by making clear that the “within Day data” is the data that the Transporter may collect under TPD M 4.2.1

TPD M 4.2.1 Where a Supply Meter is Daily Read:

- (a) the Transporter will obtain (and the User authorises the Transporter to obtain) by means of the Transporter Daily Read Equipment (where it is operational) a Meter Reading for the start and for the end of each Day;
- (b) the Transporter may so obtain Meter Readings at other times within the Day; or
- (c) in the case of User Daily Read Equipment, the User shall obtain a Meter Reading for the start and the end of each day by means of the User Daily Read Equipment and then provide the Meter Reading to the Transporter in accordance with paragraph 6.

We think that this would clarify that the “within Day data” are the Meter Readings that the Transporter chooses or chooses not to collect and the decision as to whether to collect such Meter Readings and the frequency of collection and onward transmission is entirely the decision of the Transporter. As drafted this is the only logical reading of the legal text; however we do not want this to be a matter of dispute in the future.

### 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 note the desire of the proposer of 0466A to have the data sent by means of a more secure system than the current provision by email. We understand that the justification for this is that this would better enable suppliers to fulfil their licence obligations. We note that information provided by transporters under the Post Emergency Metering Service (PEMS) is also provided to support supplier obligations and that in this case there has been no move to move towards a more secure data provision and in fact in recent years suppliers took the decision to no longer require the transporter to send

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encrypted emails. Both PEMS, as a result of smart meter roll out, and Daily Metered services will, or are likely to, undergo significant change within the next two years with the Daily Metered Voluntary service ending on 1<sup>st</sup> October 2015 or 1<sup>st</sup> April 2016 if modification 0514 is implemented and while PEMS is not a UNC matter we are surprised at the apparent inconsistency of approach.