

## 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:** Scotland and Southern Gas Networks

**Representative:** David Mitchell

**Date of Representation:** 05 November 2014

#### Do you support or oppose implementation?

0466 - Support

0466A - Support

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

Prefer 0466

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

SGN supports the intention of both of these modifications in updating and simplifying the rules for Daily Metered Sites. We acknowledge that the current regime has been in place since the implementation of the Network Code and that it is no longer fit for purpose as there are a number of rules and obligations that are placed on Transporters that are no longer relevant. SGN welcomes the proposed amendments to the obligations for provision of meter readings and we believe that they will allow us to provide a cost effective service to Users and consumers.

#### 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?

We believe that in the region of 400 sites may take up this service when it becomes available.

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

None

#### Relevant Objectives:

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

SGN believes that both modifications would allow Transporters to provide a more efficient and cost effective meter reading service for Daily Metered Supply Points thus facilitating relevant objective f)

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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?*

None have been identified.

**Implementation:**

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

SGN would like to see the lead time for the implementation of the preferred modification agreed with other industry participants who make up the UNC Panel. Agreeing a lead time that suits the majority of parties will ensure that the delivery of the modification is achievable.

**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?*

Yes

**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