

## 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:** Wales & West Utilities Ltd.

**Representative:** Richard Pomroy

**Date of Representation:** 08 October 2014

#### Do you support or oppose implementation?

Comments

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

We note the benefits to suppliers of storing the proposed information in central systems but we are concerned about the lack of data validation and the requirement to populate the information when Users become aware of it which effectively makes this optional. We recognise that Suppliers are keen to support the population of this information and that proposals are being put forward under SPAA to require this information to be recorded, nevertheless based on past experience we are concerned that data quality in central systems that is provided by Shippers may not be as good as intended regardless of obligations placed on Suppliers by other governance arrangements. Although this modification is only affecting legacy systems we assume that the information will be used to populate NEXUS systems so data quality issues will carry over. As this modification will benefit Shippers we will take account of Shipper representations when deciding whether to support this modification taking account of their answer to the specific question regarding the time they will need to develop their systems to make use of the facility.

#### 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."*

N/A

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

Not for 0487S noting that a variation has been raised which will be considered by the modification panel.

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18 September 2014

Version 1.0

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**Self Governance Statement:**

*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?*

It would support relevant objective d securing effective competition between suppliers although with the caveat that we believe that more robust requirements around data quality would enhance the impact on this relevant objective.

**Impacts and Costs:**

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

N/A

**Implementation:**

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

**Legal Text:**

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

The legal text is consistent with the intent of the 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.*

It is unclear what happens in the following circumstances: a supplier appoints an ASP and there another ASP's equipment in place so the supplier populates the ASP id with its service provider; the supplier then de-appoints its ASP. The supplier will remove its ASP id but it is unclear whether it replaces it with the customer's ASP id because it may not be certain whether the other ASP still has equipment on site. Different Suppliers and Shippers may take different approaches to this situation one assuming that without positive proof then it should assume nothing is in place and another assuming that since they had no information to the contrary then they should assume that the customer's ASP equipment is still in place. This could lead to inconsistencies between Shippers in how data is recorded compared to what is on site.