

08 Jul 2010

Please find below SGNs response to the issues raised by EdF on the legal text discussed at the UK Link Committee Meeting on Thursday 08 July 2010. This is in response to comments, which EdF believed existed with the legal text.

EdF queries - *italics*

SGN response - **Bold Red**

1. *M3.8.2 (b) – places a requirement on the registered Shipper to secure an opening meter reading for an NDM and submit it to the Transporter by no later than 16.00 D+7. There are no limitations on this and no exceptions. **SGN do not agree with the statement "There are no limitations on this and no exceptions". Please read in relation to comments on M3.8.4(b)***
2. *M3.8.4 (b) – allows the Transporter to reject an opening meter reading for a DME to NDM Meter Point that is not provided by 10.00am D+5. I.e. they will accept an Opening Meter Reading until 10.00am D+5. This is in contradiction to 3.8.2 (b) which provides a window up to D+7. **The new paragraph M 3.8.4 (b) introduces an exception to M3.8.2(b). Where the NDM Supply point was previously a DME Supply point the Opening Read must be provided by D+5. Clause 3.8.2(b) should be read in conjunction with M3.8.4(b).***
3. *M3.8.5 (b) – references 3.8.2 (b) and states that were an opening reading is not provided by D+7 the Transporters will produce an estimated meter reading by D+15. SO essentially the Transporters have a window from D+7 to D+15 to produce an estimated meter reading. **Agree - however M3.8.5 (a) introduces the exception for DME to NDM Supply point transfer and further reinforces that the Opening Read can be replaced up until the Exit Close Out Date, i.e. D+5. The "and" at the end of M3.8.5(a) also exempts M3.8.5 (b) from the DME to NDM scenario.***
4. *3.8.7 (b) – where a change from DME to NDM occurs the proposing User may replace the estimated reading up until D+5. This is not aligned with 3.8.5 (b) as the estimated reading window only opens at D+7 – so how can a Shipper replace an estimate that has not been issued? **See previous comment on M3.8.5 (a). M3.8.5 (a) introduces an exception for DME to NDM (referring to M3.8.7(b)) and the "and" at the end of M3.8.5(a) exempts M3.8.5 (b).***