

Bob Fletcher
Joint Office of Gas Transporters
31 Homer Road
Solihull
B91 3LT

8 October 2014

Dear Bob,

Re: UNC Modification Proposal 0487S - Introduction of an Advanced Meter Reader (AMR) Service Provider (ASP) Identifier (ASP ID) and Advanced Meter Indicator

Thank you for the opportunity to provide representation of the above noted Modification Proposal. Northern Gas Networks (NGN) offers comments on this Modification Proposal. Please find below NGN's comments in respect of the Modification Proposal.

NGN offers comments on this Modification proposal.

Summary of key reasons:

NGN are supportive of the intent of the proposal to identify better information relating to the presence of Advanced Meter Reading equipment and the associated Service Provider.

This Modification proposal is placing specific UNC obligations on Shippers to provide relevant information when they become aware of it. We acknowledge that the provision of accurate information relating to market participants will facilitate more efficient processes on change of shipper and welcome improvements in this area.

Additional or new issues:

NA

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?

Condition	Description	NGN View
A11.1(a)	Efficient and economic operation of the pipe-line system	
A11.1(b)	Efficient and economic operation of the combined pipe-line systems	

A11.1(c)	Efficient discharge of the licensee's obligations	
A11.1(d)	Securing effective competition: i) Between shippers ii) Between suppliers iii) Between DN operators and shippers	If this proposal reduces abortive site visits and associated costs then it would further this Relevant Objective.
A11.1(e)	Provision of economic incentives for security of supply to domestic customers	
A11.1(f)	Promote efficiency in the implementation and administration of the UNC	

Impact and costs:

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

None.

Implementation:

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

As outlined in the proposal.

Legal Text:

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

Yes, as the proposal currently stands pre-variation.

Any further information:

We feel it is necessary to highlight that the solution to this proposal changed a number of times after the legal text was formally requested and legal text development had started. Legal text should only be requested when the solution and the proposal are sufficiently developed, as outlined in the legal text guidelines, and should not be used as a means of modification development in its early stages.

Given this, it is especially disappointing to see a Variation raised two days before the consultation period was due to end outlining further changes to the proposal that will require additional legal text development. NGN, as legal text provider, will endeavour to consider these changes and provide updated legal text as soon as practicable.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,



Alex Ross-Shaw
Network Code Officer