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Your Reference:UNC Modification Proposal 0576

UNC Modification Proposal 0576 – Generation of an estimated Meter Reading at the Code Cut Off Date in the absence of an actual Meter Reading

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal for which National Grid Gas Distribution (NGD) as proposer would like to support.

Do you support or oppose implementation?

Support

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

The modification is required as it supports implementation of the UK Link Replacement programme (which incorporates the changes required for Project Nexus) by ensuring a Meter Reading is calculated and recorded on the Supply Point Register in the absence of a reading being provided by the Shipper User since 1 April 2010.

Relevant Objectives:

d) Securing of effective competition:

- (i) between relevant shippers;
- (ii) between relevant suppliers; and/or
- (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

f) Promotion of efficiency in the implementation and administration of the Code.

NGD concurs with the comments in the Draft Modification Report concerning the facilitation of these relevant objectives.

Impacts and Costs:

We agree with the statement in the Draft Modification Report concerning the funding of this Modification Proposal and we have no further comment in this respect.

Implementation:

We are in agreement with the implementation timescales identified within this Modification Proposal.

Legal Text:

NGD is satisfied that as provider, the legal text as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

Views on errors or omissions in the Modification Report which should be taken into account:

We have not identified any such errors or omissions.

Additional analysis or information to support your representation:

There are approximately 17,000 Supply Meter Points which have a Supply Meter recorded on the Supply Point Register but for which a Valid Meter Reading has not been accepted since 1st April 2010. It is this population which may require an estimate to be calculated by the Transporter as at the Code Cut Off Date. This will be the transitional requirement although the modification also provides for an enduring process.

We have also taken account of views expressed at Distribution Workgroup and should the Modification Proposal be implemented, will consider, as potential candidate readings, those readings previously submitted by Shipper Users during the AQ amendment process.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 655299 (andy.clasper@nationalgrid.com) should you require any further information.

Yours sincerely,

Andy Clasper
National Grid Distribution