

Representation

Draft Modification Report

Modification 0455S: Updating of Meter Information by the Transporter

Consultation close out date: **21st March 2013**

Respond to: enquiries@gasgovernance.co.uk

Organisation: Gazprom Marketing & Trading Retail (GMT&R)
trading as Gazprom Energy

Representative: Steve Mulinganie
Regulation & Compliance Manager

Date of Representation: **21st March 2013**

Do you support or oppose implementation?

OPPOSE IMPLEMENTATION

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

We believe that Transporters should be able to report concerns relating to Meter Information to Shippers however the proposed modification allows the Transporter to be able to overwrite existing Meter Information held against a Registered Shipper.

The provision and responsibility for Meter Information does not rest with the Transporter, Shipper or Supplier but following meter unbundling is the responsibility of the relevant Meter Asset Manager and accordingly any changes to Meter Information should flow through the appropriate contractual route.

The ability for the Transporter to be able to unilaterally change data is not consistent with the unbundled metering market and the commercial relationship in place between the relevant Meter Asset Manager and the relevant Supplier.

Should Meter Information be changed unilaterally the Transporter is neutral to the impact should the update subsequently be found to be erroneous.

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?

Erroneous updating of Metering Information could expose parties to inaccurate charges whilst the party making the change is neutral to the effect of the change

Impacts and Costs:

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

We will be exposed to additional administration costs associated with the investigation of notifications from the Transporter.

Implementation:

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

Should the proposal be implemented we would like to see an appropriate implementation period to enable us to put in place the appropriate procedure.

We would prefer a minimum period of 180 days.

Legal Text:

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

We have not reviewed the legal text

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.