

## Representation

### Draft Modification Report

#### 0455S - Updating of Meter Information by the Transporter

**Consultation close out date:** 21 March 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** WINGAS UK Ltd  
**Representative:** Rob Johnson  
**Date of Representation:** 21st March 2014

#### Do you support or oppose implementation?

Oppose Implementation

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

WINGAS is grateful for the opportunity to offer a consultation response on UNC Modification 0455S. Since unbundling, the responsibility for ensuring the accuracy of meter information as held by industry systems has been in the domain of Meter Asset management companies while the responsibility for managing any change in Asset details has been with the incumbent supplier. WINGAS sees no reason to alter this arrangement.

WINGAS prides itself on its thoroughness in maintaining accurate asset details as failure to do so has the potential to cause at least temporarily a material impact on our business. While in general we approve of the spirit of this modification to improve industry data, we also perceive additional risks in it.

- It is unacceptable that a transporter can change asset data as they sit outside the MAM / Supplier arrangement and will the same negative impacts to their business if they incorrectly change asset details.
- Any erroneous change would negatively impact customer billing and therefore our reputation.

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

No

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

If Asset details were to be updated incorrectly it would expose suppliers to inaccurate charges through no fault of their own while the transporter who made the change has no commercial or economic incentive for accuracy..

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Version 1.0

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**Impacts and Costs:**

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

Additional time and effort would be required in validating any transporter driven change to asset details.

**Legal Text:**

*Are you satisfied that the 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.