

## 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:** Winchester Gas  
**Representative:** Huw Comerford  
**Date of Representation:** 13 March 2014

#### Do you support or oppose implementation?

Not in Support

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

We support the premise of the modification however concerns over various aspects. We don't believe this is a self-governance modification as per our below comments and don't agree with Transporters updating asset information for which they are not responsible. Given that the majority of these sites will be identified via must read visits SSP shippers should be paying a lower percentage of the developments cost as they are less likely to benefit from this modification given SSP sites are not currently subject to must read visits. We also be the proposed transactional costs are high for updating asset details.

**Modification Panel Members have indicated that it would be particularly helpful if as part of the consultation process views could be provided on the Workgroup's recommendation that the self-governance status should be reviewed.**

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

We do not agree that that this is a self-governance modification. Given that asset details could be updated by party who is not responsible for updating they details and this could have a commercial impact along with the transactional costs if the asset details are updated by the Transporter. There is also a possible impact on consumers billing if assets are incorrectly updated by the Transporter, i.e. the meter is updated to imperial but should be metric.

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

#### Relevant Objectives:

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

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**Impacts and Costs:**

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

We currently have not completed any impact and cost analysis for this modification.

**Implementation:**

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

**Legal Text:**

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

**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.*