

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: E.ON
Representative: Colette Baldwin
Date of Representation: 19 March 2014
Do you support or oppose implementation?

Not in Support

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

Whilst we are supportive of the spirit of the proposal – to ensure the most accurate data is held on GDNs systems, metering competition introduced the supplier hub principle which put suppliers in the central role of receiving and updating metering information. RGMA arrangements set out how metering information was to be exchanged along the supply chain and updated to the GT. Those arrangements are underpinned by commercial contracts between the supplier and their metering providers and the GT is not party to those contracts. The proposal presumes that the GT is the authority of “correct” information, but that is not always the case, as the GT’s agent may have attended the wrong meter, have misunderstood the meter location and/or picked up incorrect data themselves, particularly when there is more than one meter at a site.

Suppliers send ONUPD and ONJOB files to update meter asset information to the GT. Where meter updates are not processed, resulting in out of date meter asset information on the GT systems, this is not largely as a result of files not being sent, but of files being rejected by the GTs agent for a variety of reasons. This can be a timing issue – a meter exchange taking place close to a COS event which is then not accepted by the GT because the ONJOB/ONUPD is sent by the losing supplier and received after the COS date.

Before giving the authority to the GT to change information that is the subject of commercial arrangements between other non UNC parties, we would recommend that options be investigated in SPAA where the governance of metering updates by suppliers resides. Reporting and performance targets could be considered by SPAA to improve data quality. Equally other initiatives currently underway could drive improvements in this area too...Performance Assurance and/or Data Quality initiatives being initiated by Xoserve in preparation for Project Nexus implementation. These should be explored before unilaterally permitting the GT to change supplier’s critical information.

The meter is a critical to the supplier to ensure accurate billing of the customer for their gas consumption. The supplier is incentivised therefore to ensure that meter information is updated in a timely manner.

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?

No. The data the GT seeks to change is the subject of commercial arrangements between suppliers and their commercial metering providers. Giving the GT the right to change that data, potentially without the consent of those whose asset information is being challenged by the GT interferes with the commercial arrangements that support the competitive market, and therefore is contrary to the support of the relevant objective D: to facilitate competition between suppliers.

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

The issue should be progressed by SPAA and/or via Performance Assurance arrangements currently being developed.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We don't believe this modification facilitates the relevant objectives and in actual fact has a negative impact on Objective D.

Impacts and Costs:

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

Our systems are not set up to receive asset updates from the GT, this modification would need significant system development and new processes to validate the data and manage GT initiated files. We believe this investment would be better targeted in development of Performance Assurance processes that will be delivered as part of the Project Nexus implementation.

Implementation:

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

No earlier than Nexus Implementation given the system changes that would need to be delivered.

Legal Text:

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

Yes

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.