

Representation For. 0017

"Amendments to the provisions governing 'failure' to obtain readings"
Version 2.0

Date of Communication: 15/06/2005
External Contact: Simon Howe (RWE Npower Plc)
Slant: Comments
Strictly Confidential: No

Abstract

Dear Julian,

Thank you for the opportunity to respond on Mod 0017. RWE npower are broadly supportive of this proposal which will introduce discretion that will be of mutual benefit to both Users and Transporters.

There is however an opportunity available to all within this proposal that we feel would be of significant benefit to the industry. We urge the proposer to consider amending his proposal to accommodate our suggestion.

Although we acknowledge that it is a regulatory obligation of Suppliers under Supplier Licence Condition 17 (SLC 17) to ensure an inspection read is provided to the relevant Transporter at least every two years, there is an opportunity for 'Must Reads' to satisfy this obligation. We believe that the Transporters' current position is that such reads do not satisfy SLC17.

As a qualified meter reader has to obtain a 'Must Read' then it would be efficient use of resource if, at the same time, the meter reader performed an inspection. This would be of specific benefit in those instances where an entry warrant has been obtained. It has been our experience to date that provision of entry warrants for meter inspection purposes has been difficult to obtain whenever a warrant has recently been issued for 'Must Read' purposes. It is our opinion that this would demonstrate a significant advance in the efficient use of resources and reduces the impact on the consumer.

To date Transporters have been reluctant to allow 'Must Reads' to satisfy SLC17 requirements. As a Supplier we fully understand these concerns and we do not seek in any way to escape our obligations in this aspect. The cost to Suppliers of Transporter's Must Read attempts already demonstrates a considerable incentive to ensure that Supplier's are aware of their SLC17 obligations. We would hope that the greater efficiency of resources, the improvement on meter inspection performance and most importantly the considerable safety benefits would persuade all that this is a pragmatic solution to an industry problem.

I would be happy to discuss any of the issues raised with you.

Yours sincerely,

Simon Howe.
Gas Network Codes Manager