

Representation - Draft Modification Report UNC 0652

Introduction of winter read/consumption reports and associated obligations

Responses invited by: **5pm on 14 March 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Kirsty Dudley
Organisation:	E.ON
Date of Representation:	07/03/2019
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

We support the proposed modification we feel that the benefits of ensuring winter reads are entered into settlement within the November/December & February/March windows will achieve the goal of ensuring more accurate WAR banding allocation.

Our qualified support is due to the implementation date propose which we oppose, should this date be revised we would look to support the change.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

We do not support the implementation date and propose an alternative implementation date which sees the change take effect from 2020/21 charging year.

This is on the basis that the Smart/AMR metering will need to be installed by the end of 2020 under a supplier licence mandate, which will go a long way to ensuring timely meter reads are retrieved within these periods in EUC03.

As there is no currently no mandate to remotely read meters in EUC03 combined with the DCC infrastructure issues hindering the roll plans in the north of the UK a 2019/20 implementation date will create an enhanced reliance on either pedestrian meter reads within these months or contacts with customer provided reads which we don't believe was an intended consequence of this modification.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

Implementing the change for the 2019/20 charging year could require meter reading frequency changes to ensure pedestrian reads are taken within the months including an

allowance to allow time to revisit failed cyclic reads within the windows outlined, as well as a small system change.

We feel this would inevitably increase cost & effort to meet the required read submissions windows outlined, so a cost of approx. £50K (further quantification of this would be still be required) to cover the 2019/20 charging year. We feel much of the cost is avoidable if implementation was delayed until charging year 2020/21 therefore, would better enable the read requirement as it's closer to the license condition mandate.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

We are satisfied the legal text will deliver the intent of the solution.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

None that we are aware of.

Please provide below any additional analysis or information to support your representation

NA.