

Representation - Draft Modification Report 0526S

Identification of Supply Meter Point pressure tier

Responses invited by: **5pm 10 June 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Joanna Ferguson
Organisation:	Northern Gas Networks
Date of Representation:	10/06/2016
Support or oppose implementation?	Oppose
Relevant Objective:	d) None

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

This Modification seeks to oblige DNs to publish the pressure tier data of all postcodes in their Network, identifying which postcodes are made up solely of single tier pressures and which hold multiple pressure tiers.

DNs have already agreed to provide this data for the wider industry as it is our understanding that it is primarily meter asset managers and suppliers rather than Users (shippers) that will utilise this information. As this data is already being made available to relevant parties we do not believe that this Modification will further any of the Relevant Objectives and therefore should not be implemented.

Self-Governance Statement: Please provide your views on the self-governance statement.

We agree that this Modification qualifies for self-governance.

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

Implementation could be immediately after the Appeals window closes following implementation by the Modification Panel.

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

As DNs already supply the data we would face no additional costs following implementation of this proposal. We will monitor access to the data to ensure that the manually intensive quarterly process to develop the report has been cost effective.

Should we establish that the production and publication of the data is not utilised it would be more cost effective to cease the service and free up the resources to other activities.

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

Yes.

Modification Panel Members have requested that the following questions are addressed:

Q1: Respondents are asked to provide views on the impacts to SPAA parties

Pressure data is required by meter asset managers (MAMs) and suppliers to comply with their obligations associated with meter installation. As MAMs and suppliers are not party to the UNC we do not believe that Modification 0526 is in the appropriate governance arena. We believe that should an obligation for publication of data be necessary then it would be better placed in the SPAA as this would be more visible to the relevant parties. In order to ensure that relevant parties are aware of the availability of the reports that DNs are already publishing it has been necessary to send notification of how to access the data through a SPAA distribution list to reach the correct parties.

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.*

No.

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

N/A