

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:	Natasha Ranatunga
Organisation:	EDF Energy
Date of Representation:	10 June 2016
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

As noted at the May UNC workgroup, the provision of pressure related information is a legislative requirement and therefore EDF Energy supports the drive to facilitate the provision of this information more efficiently and effectively.

The provision of this information will enhance the existing Meter Asset Managers (MAM) process to ensure that the appropriate skilled staff with the correct metering equipment is sent to site. With the smart metering rollout; it is critical that industry parties are able to minimise the number of installations that are aborted as a result of incorrect or incomplete information.

EDF Energy would prefer the pressure tier information to be accessible at a metering point level as this makes it easier to incorporate this data into our systems and processes. However the proposed solution is better than the current baseline and so support this solution rather than retain the current process.

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

We agree that UNC 0526S should follow the self-governance procedures, as it is simply providing pressure tier information through an alternative route to that currently provided using the GT1 process.

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

We welcome implementation as soon as possible

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

The enhanced provision of this information would be very useful in allocating our installation resources appropriately. Whilst the volume of aborted gas meter installations is estimated to be quite low, anything that can be done to reduce costs and time is welcome.

What is not clear from the draft modification report is what the 'centrally accessible register' that is referred to will actually look like, and what the 'appropriate mechanism' that will be used to access this information will be. We would need the ability to be able to download this information from this central register in its entirety to enable that dataset to be incorporated into our systems and operational processes. Otherwise a process that requires us to check this register for each site visit that we plan to undertake will continue to be inefficient and costly.

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

The Legal text should obligate the Transporter (excluding National Grid NTS) to publish the pressure tier data by postcode on a quarterly basis, identifying the pressure tiers outlined in the GT1 document maintained by the Energy Networks Association.

The proposed solution sets out that the data is updated and refreshed quarterly - at the end of February, May, August and November each year. Therefore we believe that the suggested legal text does not reflect the intent of the solution and should be amended:

5.18.1 The Transporter (excluding National Grid NTS) shall publish on a quarterly basis by postcode details of the relevant pressure tiers operating within its gas distribution network ~~from time to time~~ at the end of February, May, August and November each year.

Furthermore, the proposed solution set out that at post code level, the pressure tier will be defined as a valid set as follows:

- LP
- MP35
- MP65
- MP105
- MP180
- MP270
- IP
- Mixed
- Unknown

'Mixed' and 'Unknown' is not set out within the Energy Networks Association published document GDN/PM/GT/1. We believe that the suggested legal text for 5.18.2 does not reflect fully the intent of the solution and should clarify that what will be published where there the Relevant Pressure Tier is unknown or where there may be a combination of pressure tiers.

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

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

No comment

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

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

None