

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:	Hilary Chapman
Organisation:	SGN
Date of Representation:	8 th June 2016
Support or oppose implementation?	Oppose
Relevant Objective:	d) None

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

SGN do not consider that the provision of pressure tier information is a UNC matter and therefore do not support this modification. We do not consider that the modification furthers any of the relevant objectives.

Requests for pressure tier information are currently managed through the GT1 process, which includes SLAs for responses, and the data is typically exchanged between MAMs and Gas Transporters. This process is not governed by UNC and involves non-UNC parties.

Furthermore, we do not consider that the modification adequately assesses or justifies provision of the pressure tier information to the specified parties, namely Shippers, Suppliers and MAMs. This has been repeatedly raised during workgroup development.

Whilst we do have the above concerns with the modification itself, we recognise that pressure tier requests on a one-by-one basis may not always be ideal, especially in the circumstances where large volumes of site visits are required, such as during the Smart metering roll-out. With this in mind, SGN has worked together with the Proposer, Xoserve and the other GDNs to facilitate the provision of a large portion of pressure tier data in an effort to formulate a suitable solution which takes into account the requirements and impacts upon all relevant parties. This has been completed and the solution is in place, in advance of the modification being implemented. To this end we have demonstrated a commitment to working constructively and cooperatively with fellow industry parties, and, in combination with the above concerns, consider this modification to be an inappropriate and unnecessary governance step.

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

SGN supports the self-governance status of this modification.

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

The solution has already been implemented, and therefore while the modification could be approved at any point, we consider that it is not required.

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

Costs

SGN has, and will continue to incur costs to gather and maintain this data. These costs are additional to those already incurred through management of the GT1 process.

Xoserve has also incurred costs while setting up the data repository and will continue to incur costs while managing the publication process.

Impacts

As a large portion of the pressure tier data is now available, we would expect to see a material reduction in GT1 requests.

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

As above, we do not consider that it is necessary to use governance procedures to place an obligation on GDNs to provide this data, as this is already facilitated through the GT1 process.

However, on the basis that the modification to the UNC has been pursued, we would have expected equivalent consideration to be given to the other relevant codes, including SPAA and MAMCoP. The modification stipulates that access should be provided to Shippers, Suppliers and MAMs, and therefore if it is felt that a formal change is required to one code, we would have expected to see a reflection in the others, to ensure that all recipients of the data are captured.

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