

Mr J. Majdanski Secretary, Modification Panel Joint Office National Grid Gas **Centrica Energy** 

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30 May 2006

Dear Julian

## RE UNC Modification Proposal:- 0080 Acceptance of AMR reads at supply points with correctors

Thank you for the opportunity to comment on these Modification Proposals.

As proposer, we are supportive of the implementation of this Modification Proposal.

We believe that it will facilitate a greater number of AMR readings to be accepted by the systems. This in turn facilitates greater efficiencies within the operation of the Shipper and Supplier processes.

We believe that implementation of this Modification Proposal will further the relevant objectives, as specified in SSC A11 of the Gas Transporters licence, by:-

- Efficient and economic operation of the pipe-line system (para (a))
- Securing effective competition between relevant suppliers and shippers (para (d) and (ii))

We have only one substantive comment on the Draft Modification Report, which is in respect of the proposed legal text. The Modification Proposal is specific in citing the existing process for reads of Daily Metered supply points. This requires the provision of the corrected read in addition to either the Meter index <u>OR</u> the uncorrected reading from the corrector. However, in the proposed drafting for this Modification this would only relax the requirement to provide the uncorrected reading. This may be more restrictive to some Users than was intended by the Modification Proposal.

It had been suggested that simply to include the term "Remote Meter Reading Equipment" alongside Daily Read Equipment would support this additional flexibility. In this event the drafting could read:-

1.4.3 For the purposes of the Code, in relation to a Supply Meter:

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## (a) a "Meter Reading" is:

- (i) the reading of the index of the Supply Meter; and
- where a convertor is installed as described in paragraph 1.2.3, the converted and the unconverted readings of the convertor

except that where Daily Read Equipment, or Remote Meter Reading Equipment, and such a convertor are installed, a Meter Reading need not include both the reading under paragraph (i) and the unconverted reading under paragraph (ii)

We commend adoption of this simpler drafting.

Please contact me if you require any further information.

Yours sincerely,

Mike Young Commercial Manager