

02 June 2006

Julian Majdanski UNC Modifications Secretary Joint Office of Gas Transporters 51 Homer Road Solihull B91 3LT

Dear Julian

Uniform Network Code Modification Proposal 0080 – "Acceptance of AMR reads at Supply Points with Correctors"

Thank you for the opportunity to respond to the above modification proposal. Gaz de France ESS is happy to offer comments, which address the issues behind the modification and set out our understanding of the original principles upon which the modification should have been based.

The recognition of the development in Automated Meter Reading (AMR) solutions has lead to the acceptance by the Transporters of Meter Readings provided via AMR. These reads are collected remotely and as such are not the result of a physical visit to the meter.

The industry has also been reviewing the arrangements in place where both a Meter and Converter are in situ. In such circumstances the Meter is connected to the Converter which takes pulses from the meter and records both an Uncorrected (a record of consumption based on recording the number of pulses sent from the meter) and Corrected (the consumption then corrected for actual temperature and pressure) reads which are then held in the Corrector and can be read physically by the meter reader or transmitted onwards via ports to a AMR device or Energy Management System.

Currently the UNC states where a Meter and Converter are fitted it requires the provision of the Meter Read, Uncorrected Read and Corrected Read to be provided. This is based on the historic nature of the reading service being a physical visit to the site.

When an AMR solution is installed at the site it generally takes its output solely from the Corrector (as the Corrector will be utilising the Pulse feed from the Meter) and accordingly is able to record both the Uncorrected and Corrected data from the Corrector. In most cases it is unable to directly record the Meter Index itself. The AMR therefore generally is able to transmit the Uncorrected and Corrected data to

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the Supplier via the AMR service. To obtain the Meter Read from AMR would mean deriving it from the record of uncorrected consumption at site.

The principle we believe that should have been addressed in the modification is therefore: -

If a Corrector is present and an AMR is installed the requirement to provide reads to the Transporter should always include the Uncorrected and the Corrected Reads but should not mandate the inclusion of the Meter Read.

If you have any queries regarding this response please contact me on 0113 306 2104.

Yours sincerely

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