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Your Reference 0080

Re: Modification Proposal 0080; Acceptance of AMR reads at supply points with correctors

Dear Julian,

Thank you for your invitation seeking representations with respect to the above Modification Proposal.

National Grid supports implementation. We understand that the primary objective of the Proposal is to enable simplification of the installation of Automatic Meter Reading (AMR) Equipment where converters are installed. This would therefore reduce the costs of an AMR solution.

We share the view that allowing a greater number of actual Meter Readings to be accepted on the system is likely to improve relevant processes such as AQ derivation and Individual Meter Point Reconciliation. However, we believe that this is a passive benefit on the basis that the Uniform Network Code (UNC) already permits the submission by Users of Non-Daily Metered (NDM) Meter Readings procured by AMR equipment. This Modification Proposal increases the likelihood of greater numbers of such equipment being installed given that costs of installing such would be reduced.

We agree with the SME's clarification that the Meter Reading requirements for Supply Meter Points where a convertor and AMR equipment are installed are proposed to be:

- a reading of the index (mandatory)
- the converted reading (mandatory)
- the unconverted reading (optional)

We note that the legal drafting reflects the above position.

National Grid's opinion is that implementation of this Modification Proposal would facilitate the relevant objectives, as specified in SSC A11 of the Gas Transporters licence, by securing effective competition between relevant suppliers and shippers (para (d) (i) and (ii))

Yours sincerely

Declan McLaughlin
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