Representation For.0080

"Acceptance of AMR reads at supply points with correctors "
Version 1.0

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External Contact:	Heidi Martin(RWE Npower Plc)
Slant:	For
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Abstract

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Mod 80 'Acceptance of AMR reads at supply points with correctors'

Dear Julian,

Thank you for the opportunity to respond on Modification Proposal 80.

We support the implementation of this modification proposal as we support the introduction of AMR metering equipment into the market.

We agree with the proposal that by allowing a greater number of meter readings to be accepted will be of benefit to Shipper/Suppliers as it will improve operational processes such as the AQ process and Settlements. We also believe that this may help the Transporters in the planning and operation of their networks which promotes the efficient and economic operation of the pipe line system.

We would like to address the concern with regards to the possibility of drift between the meter reading index and the unconverted read. AMR/SMART metering is only just being introduced into the market and we appreciate that the robustness and accuracy of the technology is unproven. However the potential for differences

between actual usage and meter read volumes currently exists. For example customers own reads allow inaccuracies (eg. mis-reading index, potential to under record consumption) in meter reads to be accepted and used as part of the Settlements and AQ process. These inaccuracies are redressed once an actual read is obtained. We do not believe that the issue of drift, in light of this and especially at its current small numbers is of substantial issue given the greater benefits that AMR will bring.

It may be useful for the industry to discuss these issues further and we would be happy to participate in these discussions. However we feel that this is an issue that should be recognised as not impacting directly on converter reads or this modification proposal.

In considering the modification proposal we reviewed the Uniform Network Code Validation Rules specifically Section 3.6. Though not directly related to this modification proposal we would like to ask for some clarification on the impact AMR will have on the tolerance checks for cyclical reading validation.

We would be happy to discuss any points that you feel need clarification

Yours sincerely,

Heidi Martin
Gas Network Codes Analyst

