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8<sup>th</sup> October, 2009.

Your Reference: Modification Proposal 0258 & 0258A.

**Re: Modification Proposal 0258 & 0258A: 'Facilitating the Use of Remote Meter Reading Equipment and the Procurement of Data from a Third Party for the Purposes of Demand Estimation Forecasting Techniques'.**

Dear John,

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

National Grid Gas plc (Distribution) (NGD) would like to offer support for both of these proposals, with a preference for implementation of 0258A.

If implemented, either proposal would allow the installation of Remote Meter Reading Equipment on the range of Non-Daily Metered (NDM) Supply Point Components detailed in UNC TPD section H1.6.5(a). This is excluded by the current use of the term "data recorder" which rules out remote reading. NGD agrees that it is important when amending the definition, to include the protection offered to Daily Read Equipment in relation to installation, works and mistreatment.

Proposal 0258A also seeks to permit Distribution Network Operators (DNOs) to procure relevant NDM sample data from a third party (e.g. shippers, suppliers and end consumers) for demand estimation purposes. We note that it may additionally be appropriate to obtain information from other parties e.g. Meter Asset Managers and Automated Meter Reading Service Providers.

NGD supports the view that in some cases it may not be appropriate or efficient to install an additional device where suitable third party owned read equipment is already available. We further believe that the DNOs' responsibility to ensure a representative NDM sample population would not be diminished. Consideration would still have to be given as to whether the fitting of the automated reading equipment would trigger a change in customer behaviour/consumption potentially affecting its suitability for inclusion within the sample.

In relation to the better facilitation of the relevant objectives, NGD agrees with the comments put forward by both Proposers particularly in relation to SSC A11.1(d):.....the securing of effective competition and the potential for improvement in the quantity and quality of the information received on the relevant NDM sample Supply Meter Points may improve the confidence levels associated with the NDM demand estimation algorithms.

Please contact Alison Chamberlain on 01926 653994 ([alison.chamberlain@uk.ngrid.com](mailto:alison.chamberlain@uk.ngrid.com)) should you require any further information with respect to the above.

Yours sincerely

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