

## Further Representation

### 0345 - Removal of Daily Metered voluntary regime

**Consultation close out date:** 05 September 2011  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** **E.ON UK**  
**Representative:** Brian Durber  
**Date of Representation:** 01 September 2011

**Modification Panel Members have indicated that it would be particularly helpful if the following questions could be addressed in responses:**

*Q1: which of the following dates would you recommend as an implementation date for this modification:*

01 October 2011 - not supported  
01 October 2012 - not supported  
01 October 2013 - qualified support

*Q2: How would you justify your support/lack of support for the above dates? You may wish to include views on the development of alternative metering solutions.*

In our original response we expressed concerns that the alternative to Daily Metered Voluntary (DMV), namely the new Daily Metered Elective (DME) regime introduced by UNC 0224 had not had the opportunity to demonstrate its effectiveness, primarily because no one had taken up the service. Our understanding is that this is still the case. We would wish to make clear our own position on DME. As part of the UNC 0224 consultation we supported the Proposal but did have reservations which we included in our response. As part of the UNC 0224 development process we made clear to Xoserve that we did not contemplate taking up the service until at least the latter stages. We understand that this information together with that provided by other shippers formed part of the demand analysis and was shared with Ofgem. Our main reason for general support of 0224 was that a shorter data collection and settlement time frame would deliver better forecasting and reduced risk leading to reduced shipper costs.

We believe that this can also be delivered via project Nexus.

#### Project Nexus

Project Nexus discussions have included a number of options for more frequent meter reading and shorter settlement timescales including an aspiration for all supply points eventually to be settled on a daily basis. Indeed the work done by the UNC 0224 Development Group has provided a basis for some of these discussions.

We anticipated at the outset that should the DME regime prove effective it would provide a catalyst to removal of DMV which would effectively become obsolete.

We believe that the DMV regime should remain in place until either, take up of DME and subsequent proof of efficacy is achieved, or a project Nexus solution is developed tested and proven.

We recognise that in spite of the above, DMV may still be discontinued. Should this happen, of the prescribed dates given we prefer October 2013 although as stated above our ultimate preference is that any date be deferred for the reasons given.

**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*