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Date : 7 October 2009

Dear John,

Modification Proposal 0258 and 0258a - Facilitating the Use of Remote Meter Reading Equipment for the Purposes of Demand Estimation Forecasting Techniques

Thank you for providing Scottish and Southern Energy plc (SSE) with the opportunity to comment on the above Consultations.

SSE has qualified support for both Proposal 0258 and 0258a.

SSE supports the principle and intention of both the original modification and the amendment. Both are pragmatic with more recent developments in meter reading technology and the changing demands of suppliers and consumers in terms of their own meter reading requirements. Having the ability to utilise these developments should lead to greater efficiency and cost benefits.

However we do have some concerns around the legal drafting for modification 0258 and in particular the obligations placed on the Registered User in the new section (c) of the re-drafted UNC Transportation Principal Document (TPD) H 1.6.9 . The drafting is not clear and our belief is that the section seeks to place the same obligations on the Registered Users for Remote Meter Reading Equipment and data recorders as were previously required for NDM meterpoints in the sample, where Daily Read Equipment was used. Additionally the phrase ‘The Registered User will cooperate with the Transporter.’ followed by ‘the Registered User shall adhere ...’ does not provide absolute clarity as to the obligations that would reside on Registered Users.

We do not believe that the same degree of support is needed for Transporters from Registered Users in respect of meters within the demand estimation sample compared to that required for Daily Metered supply points. As we are not informed which of our meters are within the sample currently, we believe we would be unable to meet some of these obligations.

For this reason our support is qualified and absolute support would only be possible when these issues have been addressed through the appropriate and relevant legal drafting.

Please do not hesitate to give me a call if you wish to discuss this further.

Yours sincerely

Anne Jackson
Retail Gas Business Manager
(via email)