

Representation

Draft Modification Report

0469S - Transporter Gas Safety Visit Reporting

Consultation close out date: 04 December 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: British Gas Trading
Representative: Andrew Margan
Date of Representation: 09 December 2014

Do you support or oppose implementation?

Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

Modification 469S, seeks to improve transparency of the status of meters following a shipper meter removal and a Transporter Gas Safety visit. Shipperless and Unregistered sites are a major cause of Unidentified Gas and imbalance costs. This report will provide better information relating to the meter status, confirming the meter is removed, gas safe, registered to a shipper or requiring further investigation by a shipper. This will include the industry wide aggregate view of the outcomes and the individual meter point status.

Therefore this additional reporting will provide reassurance the industry is functioning correctly or provide information to the shipper to ascertain if an investigation is required. As a result we believe this report will better ensure the meter point status is accurately reflected in UK Link or identify incorrect meter statuses, which could be contributing to the risk of Unidentified Gas.

Therefore we support this change.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

None identified

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

Agree this is self governance

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe this report will better ensure meter points is accurately reflected in UK Link, and shipper's own systems and therefore furthers Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code.

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Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

No costs have been identified

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

We would request an implementation date at least 16 days after a Panel decision. We also request the implementation date is linked to the start of a monthly reporting period.

Notwithstanding the above, we are aware this change could have an impact on Xoserve resource. This change deliberately, does not state how soon after implementation the report must be published. Therefore we accept there will be a lead time, before the reports are produced and published, but we would expect them to cover the period from implementation.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

The Legal text reflects the solution

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.

Following the comment under 'Implementation', we understand from Xoserve, that during the implementation of the new UK Link replacement system, the reports may be deferred until the new system has bedded in. Following the transition period, we believe the reports for the relevant periods would be appropriately backdated and published in line with the intention of the proposal.