

## Representation

### Draft Modification Report

#### **0386 – Extending rights to Protected Information provisions for Meter Asset Managers / Registered Metering Applicants – unpopulated MAM id records**

**Consultation close out date:** 02 September 2011

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** **E.ON UK**

**Representative:** Brian Durber

**Date of Representation:** 01 September 2011

#### **Do you support or oppose implementation?**

Support

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

A legacy of the introduction of competition in gas metering has been the issue of data mismatches and gaps. One example being meter points for which the MAM identity is not recorded on the Supply Point Register. In these instances, although a MAM may be carrying out asset management activities they are unable to easily identify the supplier to formalise contractual arrangements and facilitate data updates. This Proposal will allow the release of the supplier identity and meter details by the transporter to an approved MAM, enabling arrangements to be put in place. This should help to ensure that appropriate arrangements exist for metering services and help to promote a more efficient means of improving data quality for all parties.

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

#### **Self Governance Statement:**

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

**Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

Standard Special Condition A11.1 (d): so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers.

We believe the above objective will be facilitated by helping to ensure that suppliers have proper arrangements in place for the metering services that they receive.

**Impacts and Costs:**

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

**Implementation:**

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

**Legal Text:**

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

**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.*