### **Representation - Draft Modification Report 0518S**

# Shipper Verification of meter and address details following system meter removals

Responses invited by: 22 June 2015	
Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	22 <sup>nd</sup> June 2015
Support or oppose implementation?	Support * delete as appropriate
Relevant Objective:	f) Positive * delete as appropriate

## Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

WWU supports this modification as it will help to cleanse the data before we download the GSR extract from Xoserve, typically 9 months after the meter has been recorded as removed. This will reduce our manual effort and costs in cleansing the data ourselves.

This modification proposal will give Shippers an opportunity to identify sites where a meter is still installed before processes in TPD G 3.7 introduced by Modifications 0424 and 0425 operate. It will introduce a report that Shippers receive 6 months after the notification that the meter has been removed has been recorded in Xoserve systems. This should help to reduce unnecessary work for Transporters and give Shippers an opportunity to avoid costs incurred under G 3.7 and thereby supports relevant objective f Promotion of efficiency in the implementation and administration of the Code.

#### **Self-Governance Statement:** Please provide your views on the self-governance statement.

As this modification impacts neither customers nor competition WWU agrees that this is a self-governance modification.

**Implementation:** What lead-time do you wish to see prior to implementation and why?

Implementation should be as soon as possible following the Xoserve system changes required to generate the report noting that this will be after the Project Nexus Implementation Date.

Impacts and Costs: What analysis, development and ongoing costs would you face?

None identified

#### **Legal Text:** Are you satisfied that the legal text will deliver the intent of the Solution?

There is a typographical error in the legal text in 3.9.1 (a). In line 3 "Shipper Users" should read "Shipper User's" this will make it consistent with line 2

Are there any errors or omissions in this Modification Report that you think should be taken into account? Include details of any impacts/costs to your organisation that are directly related to this.

None

### Please provide below any additional analysis or information to support your representation

WWU already operates a process, which sits between the process introduced by this Modification Proposal and a physical GSR cut off, with one Shipper whereby we provide a list of all premises where we are planning to cut off the service. This provides the Shipper an opportunity to notify WWU that the Supplier is planning to install a meter at the address. In these cases WWU will not perform the cut off resulting in avoided cost for WWU and potentially avoided costs and inconvenience of a new connection for the customer. We believe that other shippers could benefit from this process.