

## UNC Variation Request

### 0638 - Mandate monthly read submission for Smart and AMR sites from 01 April 2018

**Date:** 07 December 2017

The Proposer, Andrew Margan requests a variation to this modification, pursuant to UNC Modification Rules Section 6.5.1(c) of the UNC.

#### Reason for Variation

During development of the workgroup there was a divergence of views between the proposer and the provider of the legal text as to the implications of the modification, namely that there is no intention or requirement for these sites to be classified as Monthly Read sites as defined under UNC TPD M5.9. Despite clarity being provided at workstream meetings and bilaterally, it is disappointing that we are having to provide at this stage additional wording to resolve this issue. It should be noted that the CDSP clearly understands the requirement of the modification and that we are not having to provide clarity to ensure that a suitable system solution can be developed.

#### Nature of Variation

The following change to the How section, replacing current wording.

*“Include a formal obligation in the UNC, with respect to any Supply Meter able to remotely transmit Valid Meter Readings for shippers to take all reasonable steps to obtain a Valid Meter Reading at least once per month for every Annual Read Frequency Supply Meter Point to enable submission of monthly reads, from 01 April 2018”.*

The following change to section 5 of the solution is provided, based on what was provided to the provider of the legal text on 6 November 2017, replacing the current wording:

*“For the avoidance of doubt, supply meter points with AMR / SMART installed will not be classed as monthly read if their AQ suggests otherwise and hence the requirement for the change cannot be satisfied by simply amending UNC TPD M5.9, for the the following reasons:*

- *The CMA remedy has a reasonable endeavours threshold for compliance, the monthly read requirements as drafted in the UNC do not. To not reflect this in the drafting would result in a mismatch of obligation thresholds between the binding CMA remedy and the UNC.*

- *There is no mention in the drafting of the Monthly Read must reads regime applies for such sites and no inference should be taken that it does. SLC 21B.4B of the supply licence changes brought in by the CMA in fact requires that these sites to be subject to the Annual Must Read regime and even then it is not completely clear that this is a requirement as the drafting requires the supplier to obtain a read, not for the Transporters to do so in the failure they do. It is questionable as to the value of the must read process for such meters in light of the CMA obligations and the UNC Modification is justified in being silent on the matter. “*

We have also provided the following legal text to ensure that the intent of the modification is correctly interpreted (see attachment)

### **Proposer**

Andrew Margan – Centrica Plc