

Representation - Draft Modification Reports

UNC 0633V - Mandate monthly read submission for Smart and AMR sites from 01 February 2017

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

Responses invited by: 5pm on 11 January 2018

To: enquiries@gasgovernance.co.uk

Representative:	Tim Hammond
Organisation:	Corona Energy
Date of Representation:	11 January 2018
Support or oppose implementation?	0633V – Support 0638V - Oppose/
Preference:	<i>If either 0633 or 0638 were to be implemented, which would be your preference?</i> 0633V
Relevant Objective:	d) Positive

Please note: this consultation is aimed at establishing if the content / effect of the variation have caused you to change a view that you previously expressed, or to take a view that you had not previously considered. Please note any representation received in respect of Modification 0633 0638 will be carried forward should parties not wish to change their original representation.

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

Our views have not changed since the original proposal, namely that Corona Energy (CE) supports UNC modification 0633 as it maximises the benefits of the new CMA obligation. We continue to oppose UNC modification 0638 as it simply codifies the CMA requirement and does not improve the market.

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

UNC Modification 0633 was raised to bring forward the benefits of the new CMA remedy requiring shippers to submit meter reads each month for AMR and Smart Meter sites. This modification should be implemented as soon as possible to maximise these benefits.

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

No implementation costs

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

We are now satisfied that the legal text delivers the intent of the modification.

Modification Panel Members have requested that the following questions are addressed:

Q1: Is this proposal inconsistent with the CMA requirement?

No.

Q2: Do you believe there are any implications and/or consequential impacts that this proposal might have on Transporters' "must read" obligations?

No. There are no implications as UNC M5.10.2 gives sufficient discretion to the Transporters to choose whether to obtain a meter reading for a site.

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.*

No

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

None.