

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:	Kirsty Dudley
Organisation:	E.ON
Date of Representation:	11/01/2018
Support or oppose implementation?	0633V – Oppose 0638V – Qualified Support
Preference:	0638V
Relevant Objective:	d) Positive/Negative/None* <i>delete as appropriate</i>

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)

Although the same solution has been proposed for both options there are two different dates for implementation;

1. 0633V seeks an earlier implementation to the CMA Order.
2. 0638V aligns with the CMA Order

We do not support a date which conflicts with the CMA Order, we support parties deploying the solution earlier and do not believe these is anything which stops parties from doing so, but, we do not believe that it should be mandated via a modification when parties are already working to this deliverable.

We have given qualified support for 0638V, this is because the CMA order is for a wider scope than what we perceive the legal text covers, the CMA Order takes precedent and we are concerned that adding legal text wording which is not mirroring the requirements in the CMA Order could lead to confusion.

We understand why the modifications have been raised especially when they are seeking to do their bit to stabilise the UIG position, we however don't believe the modifications are required because the CMA Order is already in place.

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

At least 3 months as some system enhancements are required or aligned with the CMA implementation date.

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

Small change IT costs.

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

5.9.1(d) refers to Advanced Meters but all other clauses (5.9.1(a), 5.9.1(b)(iii), 5.9.2) refer to Advanced Supply Meter – should these be Advanced Meter and be consistent?

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

Q1: Is this proposal inconsistent with the CMA requirement?

It seeks to implement prior to the date explicitly referenced in the order, also the CMA Order does not include the threshold of 293,000kWh which this legal text does, which sees the mod seeking to implement only a selection of supplies in comparison to the intent of the order, we would prefer the legal text mirrored the obligations.

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

There may be impacts but we have been unable to quantify either way.

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

No further comments