

Representation - Draft Modification Report UNC 0632S

Shipper asset details reconciliation

Responses invited by: **5pm on 08 March 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Lesley Bowen
Organisation:	EDF Energy
Date of Representation:	08 March 2018
Support or oppose implementation?	Qualified Support
Relevant Objective:	f) Positive

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

In principle we support the modification, however there are wider considerations to ensure the data we receive from MAM's and MAP's is recorded correctly.

While we agree that a consistent approach needs to be taken across the industry, it is important that industry data is accurate and up to date. There are inconsistencies in the way data which is provided and interpreted. Therefore these differences should be fully understood and a consistent approach agreed across the industry as to how information should be provided.

These discussions should include all parties involved throughout the process; with the aim to agree a streamlined approach across the industry.

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

We agree that this modification meets the self-governance requirements.

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

Prior to implementation we require further clarification on the requirements, which must include any retrospective actions suppliers may need to take. Consideration must also be made to any industry work required which prevents data being shared incorrectly. Once we have a clear view of the requirements we can suggest a lead-time for implementation.

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

This process will provide clarification in the recording and sharing of information with the CDSP identifying that a Smart or AMR meter is on site. Therefore, following clarification and Industry alignment, we would expect a reduction in operating costs. This reduction will be seen by the potential decrease in issues currently experienced due to the information provided by MAM's and MAP's. However, we do require clarification regarding work required to rectify the historical misaligned information.

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

Yes

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.*

The modification notes 'Xoserve will be required to report within 3 months of the modification being implemented the number of sites in each End User Category (EUC) Band that has either an AMR or Smart Meter installed'. It is not clear if this report will be shared with suppliers and will contain sufficient information for suppliers, where they are aware; to then correct the misalignment of the data.

The misalignment of data needs to be prevented at source, by ensuring the data that the MAMs and MAPs provide in identifying Smart Meters or AMR devices is consistent.

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

The under-recording of the presence of Smart Meters or AMR devices at sites, can be impacted by the flows which Xoserve receive showing the meter type as NSS (non SMETS compliant smart meter). However, the meter may have been upgraded via a firmware update to now be SMETS compliant (S1), but Xoserve may not have been notified.

Suppliers would then count these meters in their reports to BEIS but may not have sent a revised metering flows to Xoserve.

We also understand that some MAM's and MAP's are over-recording Smart Meters by presenting SMETS 2 (S2) meter types with no Smart Meter System Operator (SMSO) included. Based on our understanding this would therefore suggest these are not S2 meters.