

Representation - Draft Modification Report UNC 0692S

Automatic updates to Meter Read Frequency

Responses invited by: **5pm on 12 December 2019**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	11 th December 2019
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We support this proposal as it sets the meter read frequency of Supply Meter Points with Smart meters or Automated Meter Read (AMR) equipment to Monthly from 6-monthly or Annual. This should improve the meter reading performance for these meters which are quite capable of providing reads this frequently.

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

We agree that this satisfies the self-governance criteria in that, although it should have a positive effect on competition, it is not material enough to require Authority Direction. We agree with the expected effect on competition as stated in the draft modification report.

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

This can be implemented when Xoserve are ready to implement the system changes necessary which detailed in the DSC Change Proposal XRN4941 "Auto updates to meter read frequency (MOD0692)". We would like XRN5036 "Update to must read process" to be implemented on the same date. This change proposal amends DN's must read selection criteria in response to the modification proposal to exclude Supply Meter Points with a meter read frequency of Monthly that have a smart meter or AMR. Must reads is a service provided by DNs that attempts to obtain a read in certain cases when the Shipper has failed to submit a valid read. (See UNC TPD M 5.10)

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

The cost of implementing XRN5036 is unknown at present but is likely to be significant. We will recover this cost from the charges for the must read service.

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.*

No.

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

Our understanding is that 0638V (Mandate monthly read submission for Smart and AMR sites from 01 April 2018) required all sites with Smart or Advanced metering to be read each month, regardless of AQ. That modification did not require these Supply Meter Points to be set to a read frequency of Monthly. Consequently, although there was an obligation to read these meters each month this has not happened to the extent desired probably because Suppliers read according to the read frequency which remained at 6-monthly or Annual.

The logic of amending the must read criteria in XRN5036 is that if a smart meter or AMR is fitted then it is reasonable to expect a Supplier to be able to easily obtain a read. If the equipment fails then then it is reasonable to expect the Supplier to visit the site to fix the equipment problem at which point either automated reads would recommence or the Supplier would obtain a manual read. This means that the only reason that one of these Supply Meter Points would require a must read would be to some failure by the Supplier. We think that in these cases the Supplier should take the necessary steps to obtain the read and that the obligation should not fall onto the Transporter.