

Representation - Modification UNC 0722 (Urgent)

Allow Users to submit Estimated Meter Reading during COVID-19

Responses invited by: **1pm on 27 April 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Phil Lucas
Organisation:	National Grid NTS
Date of Representation:	27 th April 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

National Grid NTS (National Grid) recognises that the unprecedented measures implemented to address the Covid-19 pandemic has created unanticipated patterns and volumes of consumption and has inhibited the ability of shippers and suppliers to collect meter readings.

National Grid agrees that the measures advocated by this Proposal will better facilitate relevant objective (d) the securing of effective competition. This is on the basis that for period where government restrictions are in place, enabling the use of estimated reads for settlement will seek to appropriately allocate energy and transportation costs. This is arguably preferable to not providing reads for settlement (due to the restrictions), especially if a consumer's pattern and consumption of gas is markedly different to the pre Covid-19 period.

Implementation:

National Grid does not need to implement any process or systems changes as a consequence so does not require any lead time for implementation.

Impacts and Costs:

Although not explicit in the solution, we note that the definition of "Relevant Period" (as referred to in the Legal Text section below) is only applicable in respect of LDZs and therefore we understand that the Proposer's intention is that this facility would only be

available at Supply Points connected to the Distribution Networks (i.e. not at NTS Supply Points). In any case, National Grid sees the principal use of this mechanism will be in the Non-Daily Metered sector given the level of automation in the harvesting of Daily Metered meter readings - the vast majority of NTS Supply Points utilise telemetry as their Daily Read Equipment.

As referred to above, we do not need to make any process or systems changes, therefore there are no implementation costs for National Grid.

Legal Text:

National Grid agrees that the legal text will deliver the intent of the solution. We note that the legal text does not include the definition of "Relevant Period" which sets the time limit for the applicability of the provisions. We understand the definition intended is as contained in the legal text for Modification Proposal 0721 ('0721') in Transition Document Part VI section 1. Further, we understand that in the event that 0721 is *not* directed for implementation, this definition will be incorporated into the legal text for this Proposal.

Any uncertainty over the application to NTS Supply Points (as referred to above) could be addressed by making the following clarification in Transition Document Part VI section 1.1(b) "*Relevant Period*" means, in respect of an LDZ **only**."

Are there any errors or omissions in this Modification Report that you think should be taken into account?

Recognising that this Proposal one of four raised to address issues created by the management of the Covid-19 pandemic, in the event of implementation National Grid would support the conduct of post-event review (undertaken at the appropriate point) to incorporate analysis of the usage of the estimated reads in the Relevant Period and any impacts (adverse or otherwise) this had on settlement or other UNC processes.

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

N/A