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Modification Panel Secretary
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06 June 2008

Dear Julian,

Modification Proposals: 0202 Improvement to More Frequent Reading Provisions to allow benefits of AMR.

Thank you for the opportunity to comment on Modification Proposal 0202. Scotia Gas Networks offers qualified support for this Modification Proposal.

Under the UNC there is a limit on the frequency of meter readings which can be accepted by UK Link, as the system is constrained in the number of daily meter readings it can cope with. The current UNC provisions allow Users to submit reads to:

- Monthly Read sites - 7 days
- Non-Monthly Read Large Supply Points - 14 days
- Small Supply Points - 63 days (i.e. quarterly).

SGN is supportive of the principles of this modification proposal and recognise the benefits of AMR Services. We believe the provision of more frequent meter reads have potential to provide timely and accurate meter readings which would facilitate more accurate billing and allocation of cost, additionally monthly meter reads would provide up-to-date AQs which may add benefit to profiling. Furthermore, we believe this is in line with the Authority's policy of encouraging AMR.

However, SGN have concerns with regards to the anticipated take-up of AMR, which has not been fully identified, thus the volume of reads which may potentially be submitted to xoserve is also unknown. Implementation of this proposal would allow Users to elect I&C Small Supply Points to be Monthly Read Meters, this will permit Users to submit readings for Monthly Read sites in any 7 day period; as per UNC Section M 3.7.2(a). Currently we believe there to be between 380,000-1,500,000 small I&C sites which could potentially chose to have AMR fitted. On 380,000 sites this would equate to a minimum of 8,000 additional meter reads per day, even at this level there is potential to exceed existing UK Link capability of 400,000 readings per day therefore SGN is concerned that any obligation to cope with more frequent meter readings may comprise systems



and/or require significant investment. Further clarification regarding potential take-up and timescales is required to fully assess system implications and requirements.

SGN believe that implementation of this proposal would help facilitate relevant objective A11.1(d). We believe by improving the accuracy of invoices implementation of this proposal may benefit users and help secure effective competition between relevant shippers.

We hope you find these comments helpful.

Yours sincerely

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