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*(by e-mail)*

Dear Tim

**UNC Draft Modification Report 0279 - Improving the availability of meter read history and asset information**

Thank you for the opportunity to respond to the above Draft Modification Report.

This response is non-confidential and ScottishPower are happy for this to be posted on your website.

ScottishPower are supportive this Proposal.

The proposal aims to make meter read history and asset information available to shippers to overcome the current difficulties with the AQ Review process whereby the current supplier has insufficient meter read and meter asset information to enable a successful AQ appeal, where a change of supply has occurred. ScottishPower agree with the Proposer that by making this information available the shipper should have access to the information required to ensure that AQs more accurately reflect customer usage, which is lacking at present. However, we also believe that the provision of this information will have additional benefits, such as assisting with RGMA read issues, Shipper Agreed Reads, metric/imperial queries, as well as Shipperless sites and missing meters. We believe some of these measures will be a benefit not only to the Suppliers, but also to xoserve, since it would reduce the number of queries they currently receive.

We note the proposed solution is for the information (meter read and meter asset information held by the transporter for a 3 year period) to be provided to shippers in an annual electronic report, provided just in advance of the AQ Review via the Information Exchange (IX). Another alternative may be the addition of meter read and asset information to the existing portfolio update that is currently provided by xoserve on a monthly basis. Also, whilst we welcome the additional read and asset information, as this would only be a snapshot in time we would suggest that it might be more suitable if Conquest was updated so that such information could be available to Suppliers in real-time for sites in their ownership. However, we do recognise this may incur additional cost and time to develop.

### **Facilitation of Relevant Objectives**

ScottishPower agrees with the Proposer that the proposed modification would better facilitate the following relevant objective:

Standard Special Condition A11.1 (d): so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition:

- (i) between relevant shippers;
- (ii) between relevant suppliers; and/or
- (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

By allowing the incoming shipper access to meter read history and meter asset information ScottishPower believe that shippers will be able to conduct a more thorough AQ update than is currently possible. In particular this will be the case when a site changes ownership and the Supplier gains a customer at a key time in the AQ Review year, but presently do not have sufficient read history to update the AQ value. We agree with GDF Suez that allowing the incoming shipper access to the read and asset history will introduce a more level playing field than is currently afforded under the existing rules (where the incoming shipper is at a disadvantage to the incumbent) therefore increasing competition between shippers and suppliers.

I hope you find these comments useful and should you wish to discuss further please do not hesitate to contact me.

Yours sincerely,

Lorraine McGregor  
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ScottishPower