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18th February 2011

Dear Sir / Madam,

Re: Modification 0314 – The Provision of a “Data Update” to Non Code Parties

Please find enclosed Gazprom Marketing & Trading Retail (Gazprom) response to Modification 0314 – The Provision of a “Data Update” to Non Code Parties. We are happy for our comments to be shared with other interested parties.

Gazprom **supports** modification 0314 – The Provision of a “Data Update” to Non Code Parties. We note the provision of information relates solely to Non Domestic Sites and the data items are not considered personal data.

With the development of Automated Meter Reading (AMR) the market highlighted the need for a suitable Governance regime to ensure appropriate behaviour by new market entrants who were connecting equipment to fiscal metering.

ESTA recognised the need for a suitable Code of Practice (CoP) for Automated Meter Reading Service Providers (ASP’s) and set up a Management Committee to develop a structure.

The Committee developed the ASPCoP which is now a recognised standard which is referenced in contracts and tenders and provides a baseline for operation in the AMR market.

The ASPCoP is subject to continual review and signatories are audited to ensure conformance on a regular basis.

A newly updated CoP Version 2 was recently released. This document is freely available and can be used by any party as a reference document without requiring formal sign up to the scheme.

www.esta.org.uk/aspcop .

To date 9 key market participants have formally signed up to the CoP and these represent the major players undertaking connections within the market.

G4S
Technolog
Imserv
Gazprom Global Energy Services (GGES)
Onstream
Siemens
Pulse 24
UK Data Management
Stark

http://www.esta.org.uk/RESOURCES/ASPCoP/ASPCoP_Accredited_ASPs.php

Having developed the CoP it was recognised that no current industry data base existed which would allow relevant parties to source key information and establish the nature of existing relationships at a particular Meter Point (MPRN) e.g. Suppliers could not easily establish if AMR equipment was already present and which ASP already operated at a particular MPRN and ASP's could not identify prior to visiting site if any existing equipment was connected.

In addition it was recognised that in the AMR market ASP's may have many different contractual relationships e.g. they may be providing services directly to Consumers or Suppliers or both at the same MPRN. It was also noted that multiple AMR devices could be present at a single MPRN e.g. Transporter Loggers, Consumer Energy Management Systems and AMR equipment.

The ESTA Management Committee set up a project to develop an ASP Hub which could facilitate the provision of information to relevant industry participants. As part of the analysis it was recognised that AMR database should be populated, where feasible, with consistent industry data. Sourcing data from other routes will cost effort & development costs and will lead to inconsistencies which in turn will lead to extra operational effort for participants to resolve 'apparent' differences.

As the project developed the potential benefit to Meter Asset Managers (MAM's) was highlighted of a centralised data base to help manage connections of AMR to Metering Equipment via the Meter Pulse Utilisation (MPU) agreements.

Recognising this requirement Gazprom agreed to raise a modification to enable ESTA to request a Data extract from Xoserve on a bi-lateral basis.

We would note that this modification is limited in scope to enabling the provision of a service but does not address the commercial terms under which the service may be provided nor the cost of such a service.

Should you have any queries on our response or wish to discuss any aspect of our response please don't hesitate to contact me.

Yours Sincerely

Steve Mulinganie
Regulation & Compliance Manager