

Joint Office

[enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

11 December 2019

Dear Sir or Madam,

**Re: 0692S: Automatic Updates to Meter Read Frequency**

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

**NGN supports this Modification Proposal.**

**Reason for support/opposition:**

We support this proposal as it should further Relevant Objective d) *The securing of effective competition between relevant Shippers* as changing the Meter Read Frequency from 'monthly' to 'Monthly' for relevant sites that are Smart or have a larger Annual Quantity (AQ) should result in higher volumes of meter read submissions. This should aid with reducing Unidentified Gas (UiG) and improving competition amongst Shippers.

**Self-Governance Statement:**

*Please provide your views on the self-governance statement.*

We agree this proposal should follow Self-Governance procedures as we believe that giving the Central Data Services Provider (CDSP) the authority to correct Meter Read Frequencies to Monthly in specific circumstances will not be of material impact

**Implementation:**

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

We believe implementation of this proposal should be aligned with associated CDSP Change Orders XRN4941 Auto Updates to Meter Read Frequency, and XRN5036 Updates to the Must Reads Process, which should deliver the required central systems changes.

**Impacts and Costs:**

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

As part of associated CDSP Change Order XRN5036, Updates to the Must Reads Process, Distribution Networks (DNs) are required to fund the development of the amended trigger criteria regarding Must Reads to ensure that only appropriate sites are reported to DNs. Should an AQ threshold not also be included in the XRN solution, there could be a large increase in the number of Must Reads, which would likely result in large cost and resource implications for DNs.

**Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the Solution?*

We believe the legal text provided should deliver the solution set out in the proposal.

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Service on 0800 111 999



1100 Century Way  
Thorpe Park Business Park  
Colton, Leeds LS15 8TU



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the network**

**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.

None identified.

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

None.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)  
Market Services Manager (Industry Codes)  
Mobile: 07580 215 743

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