

Representation

Draft Modification Report

0427S: Estimated Opening Meter Reads Code Amendment

Consultation close out date: 02 November 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: E.ON
Representative: Colette Baldwin
Date of Representation: 26 October 2012

Do you support or oppose implementation?

Support/Qualified Support/Neutral/Not in Support/Comments* *delete as appropriate*

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

This modification will remove the uncertainty of whether opening reads submitted after D+7 but up to D+10 will be accepted by the Transporters' Agent. On a change of supply, if an opening reading is provided, but subsequently rejected by the Agent, there may not be sufficient time to allow the User to resolve the rejection and re-submit the reading (were the Agent to cut off acceptance of opening readings at D+7 - as permitted under the code). Estimated opening meter readings provided by the Transporters' Agent are invariably rejected by the customer who has, in their belief, provided their new supplier with a reading they expect their bill to commence from. The consequence of these customer complaints is that the Disputed Reads process has to be initiated by the new supplier and then in many cases the suppliers agree to replace the reading with that originally provided by the customer on the change of supply date. This increases cost for both suppliers and the Transporters' Agent.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

A Separate modification to the iGT UNC has been raised to ensure that there is a consistent approach to the Opening Meter Reading Submission Window across all Gas Transporters/and their Agents.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

Yes

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

This would facilitate the following relevant objectives:

D – By removing the uncertainty, Users who do not currently attempt to resolve and replace rejected opening meter readings before estimates are supplied by the Transporters' Agent may be encouraged to work the rejections and resubmit readings (having confidence in the longer submission window) which should increase the number of actual readings used in settlement. This should also assist in reducing the number of Disputed Reads that need to be worked by both suppliers over a Change of Supply Opening or Closing reading.

F – By having the code reflect what takes place in practice it will remove any ambiguity that a User may face in determining whether they can submit an opening meter reading and whether it will be accepted by the Agent between D+7 and D+10.

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

There would be no negative impacts or costs for the UNC modification as the code will reflect how Xoserve currently approach the acceptance of opening meter readings.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

Given that Xoserve have confirmed that they currently allow readings up to D+10, the modification actually reflects what happens in practice now and should be capable of being implemented immediately following the approval by the Authority.

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see www.gasgovernance.co.uk/proposedACS)] will deliver the intent of the modification?

Yes

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

IGT UNC Mod 048 is looking to remove the same ambiguity from the iGT UNC and deliver a common approach to the meter reading submission window for all GTs large and small.