

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: ScottishPower Energy Management
Representative: David McCrone
Date of Representation: 02 November 2012

Do you support or oppose implementation?

Support

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

The modification will mandate an additional three days in which Shippers can submit opening meter reads to the Large Gas Transporter. This will help to reduce the number of estimated opening meter reads that are required to be generated and therefore improve the accuracy of settlement. This will in turn improve the allocation of costs between Shippers. We also understand that this change will formalise current practice and therefore helps to remove ambiguity from the Uniform Network Code.

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

No.

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?

Extending the time in which Shippers can submit an actual opening meter reading will increase the accuracy of data being entered in settlement which will promote a more accurate allocation of costs between Shippers. This will help secure effective competition between relevant Shippers and Suppliers better facilitating Relevant Objective (d).

The modification will help remove ambiguity from the UNC by reflecting the current practice by the Large Gas Transporter's Agent. This will in turn better facilitate Relevant Objective (f).

Impacts and Costs:

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

None.

Implementation:

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

This modification reflects current business practice so could be implemented immediately after Panel approval.

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.

No.

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