



Axis House
5 Lonehead Drive
Edinburgh
Scotland
EH28 8TG

The Modification Panel Secretary
Joint Office of Gas Transporters
31 Homer Road
Solihull
West Midlands
B91 3LT

05 August 2010

Dear Bob,

RE: UNC Modification Proposal 0297: Extending Rights to Protected Information Provisions for Meter Asset Managers / Registered Metering Applicants.

Thank you for providing Scotland Gas Networks and Southern Gas Networks with the opportunity to comment on UNC Modification Proposal 0297. As the proposer of this UNC Modification Proposal we fully support its implementation.

Currently the UNC restricts the provision of Protected Information to Meter Asset Managers (defined as the Registered Metering Applicant – UNC TPD Section V 5.11.2) under the terms specified in UNC TPD Section V5.11.1. This allows for the disclosure of the Supplier identity to the Meter Asset Manager (MAM) with authorisation by the Registered User at the Supply Point regarded as having been provided. The Transporters maintain a list of Registered Metering Applicants within the Sites and Meters database linked to a specific field associated with each Supply Point to ensure Protected Information is released to the correct MAM organisation.

Historically MAM access to the Supplier identity field was introduced by Transco Network Code Modification 0664 which provided a solution to the issue of the incumbent MAM not being provided with the incoming Supplier identity during the Supply Point transfer process by the outgoing Supplier. Currently the Transporters' agent receive communications from individual MAMs requesting additional data items associated with the Supply Point where they wish to verify data they already hold or establish missing data they are entitled to hold under existing RGMA baselines. As the existing UNC Protected Information provisions do not allow for the release of this additional information the Transporters' agency are unable to comply with such requests.

Implementation of UNC Modification 0297 would allow the release of these additional data items to the registered MAM by extending the Protected Information Provisions in UNC TPD Section V5.11.1 to the data items detailed in the associated document annexed to the Modification Proposal. To ensure MAMs only receive the data they are entitled to view, the release of data would be restricted to the MAM currently registered at the Supply Point or to the MAM which was registered to the Supply Point on the Sites and Meters database for that specific historical period. To confirm, the existing RGMA communication channels between Supplier and MAM organisations would in no way be

diluted or replaced by the implementation of this Modification Proposal. The additional data provisions facilitated by this Proposal would allow MAMs access to an additional source of industry metering data, providing a validation check on data they have been provided with by Supplier organisations or data they may already hold.

As UNC Modification 0297 does not introduce a specific User Pays Service and only facilitates the release of additional Protected Information to a Registered Metering Applicant there are no development costs associated with the implementation of the Modification Proposal. Were this Modification Proposal to be implemented MAMs would be able to enter into a commercial contract with the Transporters' agent for the provision of information, either bilaterally or through the Non-Code Services framework, governed under the auspices of the Use Pays User Group.

SGN have provided additional comments in relation to section 3 of the Draft Modification Report:

3. Extent to which implementation of the proposed Modification would better facilitate the relevant objectives.

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

The extension of data provision to MAMs as specified within Modification Proposal 0297 would provide increased access to central industry metering information enabling MAMs to correctly establish the meter asset information at a Supply Point where they are or were registered as the MAM. This facility would increase confidence and certainty in industry metering information and allow MAMs to more accurately price and target their metering services to gas Suppliers. This would subsequently facilitate improved competition by facilitating increased cost reflectivity in metering charges to Suppliers. In addition to this benefit the provision of increased metering information to MAMs would reduce the number of ad-hoc queries from MAMs to Supplier organisations relating to meter asset information.

We hope you find these comments useful and if any further information is required please do not hesitate to contact myself.

Regards.

Joel Martin.