

Representation

**Draft Modification Reports - UNC 0633 - Mandate monthly read submission
for Smart and AMR sites from 01 December 2017
UNC 0638 - Mandate monthly read submission for Smart and AMR sites from
01 April 2018**

Modification Report

1. **Consultation close out date:** 20th November 2017
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:**
Gazprom Energy
3rd Floor
1 Tony Wilson Place
First Street
Manchester
M15 4FN
4. **Representative:**
Steve Mulinganie
Regulation Manager
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0799 097 2568
5. **Date of Representation:** 20th November 2017
6. **Do you support or oppose Implementation:**
We **Support** the implementation of **both Modifications** 0633 and 0638

Of the two we **Prefer Modification 0633**
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
We believe that the earlier implementation of 0633 will help address the ongoing industry issues relating to UIG. With millions of AMR and Smart Metering already deployed it seems prudent to enable the benefits of access to more granular data as soon as reasonably practicable.
8. **Are there any new or additional Issues for the Modification Report:**
No

9. Self-Governance Statement Do you agree with the status?

NA

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We **agree** with the proposers that there modifications are positive in respect of Relevant Objective set out in the relevant modifications.

11. Impacts & Costs:

What analysis, development and on-going costs would you face if this modification was implemented?

We **have not** identified any significant costs associated with either modification

12. Implementation:

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

We would like to see the modifications implemented ASAP

13. Legal Text:

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

We have **no** comments on the Legal Text provided.

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

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

We note the Modification Panel Members have requested that the following questions are addressed:

Q1: Is this proposal inconsistent with the CMA requirement?

Whilst modification 0633 brings in the requirement to provide more granular readings in advance of the date set out by the CMA it should be noted that industry issues relating to the scale of UIG have only recently come to light. In the absence of a CMA requirement the industry would have been seeking to implement solutions to address UIG in a timely fashion which would have included changes to read submission frequency. It should also be noted that when the analysis of a suitable implementation date was undertaken under 0594R Meter Reading Submission for Advanced & Smart Metering the issue of UIG had not been considered as part of the industry consultation.

Q2: Do you believe there are any implications and/or consequential impacts that this proposal might have on Transporters' "must read" obligations?

We would note that whilst increasing the frequency of meter read submission we should have a proportionate approach to the requirement for a must read obligation. It would seem logical to ensure that a common sense approach, as set out by Cadent, would be adopted across the market by all Transporters.