

Representation - Draft Modification Reports

UNC 0633V - Mandate monthly read submission for Smart and AMR sites from 01 February 2017

UNC 0638V - Mandate monthly read submission for Smart and AMR sites from 01 April 2018

Responses invited by: 5pm on 11 January 2018

To: enquiries@gasgovernance.co.uk

Representative:	Maitrayee Bhowmick-Jewkes
Organisation:	Npower
Date of Representation:	11/01/18
Support or oppose implementation?	0633V - Oppose 0638V - Support
Preference:	<i>If either 0633 or 0638 were to be implemented, which would be your preference?</i> 0638V
Relevant Objective:	d) Positive

Please note: this consultation is aimed at establishing if the content / effect of the variation have caused you to change a view that you previously expressed, or to take a view that you had not previously considered. Please note any representation received in respect of Modification 0633 0638 will be carried forward should parties not wish to change their original representation.

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

Npower's views remain unchanged from our response to the previous consultation on Modifications 0633/0638.

We support the implementation of 0638V on the basis of the mandating monthly reads from 1st April 2018.

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

As stated above, we believe implementation should be on 1st April 2018.

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

We do not foresee incurring any additional costs to implement modification 0638 at this time.

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

N/A

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

Q1: Is this proposal inconsistent with the CMA requirement?

Modification 0633 is inconsistent with the CMA order as it seeks to implement this change before the date stated in the order.

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

N/A

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.*

N/A

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

N/A