

## 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](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Richard Pomroy
<b>Organisation:</b>	Wales & West Utilities Ltd
<b>Date of Representation:</b>	5 <sup>th</sup> January 2018
<b>Support or oppose implementation?</b>	0633V - Oppose 0638V - Support
<b>Preference:</b>	<i>If either 0633 or 0638 were to be implemented, which would be your preference?</i>  0638V
<b>Relevant Objective:</b>	<b>d)</b> 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)**

We support 0638V because it implements the requirements of the CMA order on the same date as the CMA order comes into effect. We oppose 0633V because it brings the provision into effect earlier than the date the CMA order comes into effect and therefore earlier than the date for which industry has been planning. We note that the 0594R review group did not propose an earlier implementation date for these requirements.

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

The legal text does not contain a date for when the obligations come into effect so 0638V needs to be implemented on 1<sup>st</sup> April 2018, although it would be helpful to provide as much notice of this as possible.

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

WWU would not face any cost.

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

Yes

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

*Q1: Is this proposal inconsistent with the CMA requirement?*

We have no comment.

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

There are none as the legal text now makes it clear that having a smart meter or AMR does not make a site a Monthly Read site and that they will remain as Annually Read.

**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.*

No

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

These modifications illustrate the risks of raising modifications to tight timescales and thereby limiting the time available for discussion and clarification.