

Representation - Draft Modification Report UNC 0632S

Shipper asset details reconciliation

Responses invited by: **5pm on 08 March 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities Ltd
Date of Representation:	6 th March 2018
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

We support this obligation as measures to enable improved data accuracy are beneficial unless the cost outweighs the benefit. We believe that there will be a positive impact on competition between Suppliers and between Shippers because of improved information provision and the removal of uncertainty over the type of meter installed. We anticipate that accurate information may facilitate more sites moving to Class 2 though this probably would only apply to non-domestic Supply Meter Points with AMR rather than domestic Supply Meter Points with smart meters. We also agree that it facilitates objective (f) promotion of efficiency in implementation and administration of Code by facilitating demonstration or otherwise of Supplier compliance with the CMA remedy relating to reading AMR and smart meters each month.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

Although we believe that one relevant objective is (d) we do not believe that it will have a material effect on competition and therefore self-governance should apply

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

We agree that it could be implemented 16 days after a panel determination to implement it.

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

None

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

Yes

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

We understand that it is not possible to identify smart meters from the meter serial number.

We note comments in the workgroup that this information should be reported already under existing obligations. We wonder whether some Suppliers are not notifying the meter type but rather the mode in which it is used. For example a SMETS1 meter may not be being used as a smart meter so the Supplier may be not reporting it as such. Notwithstanding this we support this modification as it should reinforce the requirement for accurate reporting. We suggest that the Performance Assurance Committee should monitor this issue.