

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: 11 January 2018

To: enquiries@gasgovernance.co.uk

Representative:	Andrew Margan
Organisation:	Centrica Plc
Date of Representation:	03 January 2018
Support or oppose implementation?	0633 – Oppose 0638- Support
Preference:	0638
Relevant Objective:	d) Positive

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

Both proposals seek to introduce the CMA obligation for Smart Meter and AMR equipment to submit monthly reads into settlement. Modification 0633 seeks to introduce a 01 February 2017 Code implementation date. The CMA (Gas Settlement) Order implementation date is 01 April 2018. Modification 0638 implementation aligns to the CMA Order and seeks to introduce a 01 April 2018 Code implementation date or similar date to be directed by the Gas Transporters.

Whilst Modification 0633 does not mandate if this is a system solution or not, meter reads are transmitted from metering equipment to head end systems, to central systems. IS projects of this nature are complex and require long lead times to implement. Given system changes are required, industry Code rules mandate there is a 6 months' notice period for system changes.

A review of the CMA Order implementation date was undertaken through 0594R Workgroup. This review was open to all parties and no party requested an earlier implementation date.

As Modification 0633 does not consider the CMA Order and position letter, nor implementation guidelines and risks placing multiple parties in breach of Code, we do not support it.

Modification 0638 does take into account of the above considerations and aligns the Code implementation date to the CMA (Gas Settlement) Order and 0594R findings, we therefore support its implementation.

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

Implementation is possible on 01 April 2018, but not before.

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

Given the very compressed timescales of Modification 0633 we have not been assessed, the costs, as we believe this will waste resource due to it being un-implementable solution.

Modification 0638 has no additional costs above delivering the CMA Order.

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

We are happy to accept the legal text.