

## 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**

**Responses invited by: 5pm on 20 November 2017**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Maitrayee Bhowmick-Jewkes
<b>Organisation:</b>	Npower
<b>Date of Representation:</b>	20/11/17
<b>Support or oppose implementation?</b>	0633 - Oppose 0638- Support
<b>Preference:</b>	<i>If either 0633 or 0638 were to be implemented, which would be your preference?</i> 0638
<b>Relevant Objective:</b>	d) Positive

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

### UNC Modification 0633

Modification 0633 looks to bring forward the obligation date for smart and AMR monthly read submission to 1<sup>st</sup> December. While we are supportive of the broad aims of this modification (bringing more read data more frequently into the settlement process could have a beneficial effect on Unidentified Gas – UiG), there are a number of reasons while we feel we cannot fully support Modification 0633. Given the constricted development timescale for this modification, a number of issues have not been addressed. Firstly, it is not clear that detailed analysis has taken place to understand the effect of adding these additional reads into the settlement process during the winter period. From a general theoretical perspective, it would make sense that providing more read data into settlements would make UiG more stable and levels more reflective. However, given some of the broader AQ movements at industry level since the rolling AQ process has been introduced, and given the increase in gas demand during the winter months, there is no guarantee without more detailed analysis that levels of UiG would not actually increase for a short period. Furthermore, the level of benefit potentially afforded by bringing this date forward (if realised) is not clear. In addition, issues around transporter

must read triggering and reporting still need to be addressed, which the shorter development timescale has not provided enough time to include and consider. If Modification 0633 is implemented (the same point applies to MOD 638), it is our opinion that there is scope to request further workgroup input for retrospective development and addressing of the must read and reporting issues.

### **UNC Modification 0638**

Modification 0638 seeks to introduce the UNC implementation date for smart and AMR monthly read submission to 1<sup>st</sup> April 2018, which aligns with the original CMA gas settlement order. We believe this modification allows those organisations that were already planning for a 1<sup>st</sup> April system delivery date to complete that work appropriately, and time for the effect of bulk additions of read data in certain meter populations to be understood more fully, and be implemented outside of the more volatile winter months.

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

As stated above, we believe implementation should be on 1<sup>st</sup> 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.

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

Sections 5.9.1 and 5.9.2 might require amendments.

**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?*

There might be further impacts which we have not yet identified.

**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

