



Cadent
Brick Kiln Street, Hinckley
Leicestershire LE10 0NA
cadentgas.com

Bob Fletcher
Joint Office of Gas Transporters
Pure Offices
Room 64 Lake View House
Tournament Fields
Warwick
CV34 6RG

Andy Clasper
Regulation and External Affairs
andy.clasper@cadentgas.com
Direct tel +44 (0)7884 113385

10th August 2017
Your Reference: UNC Modification Proposal 0570

UNC Modification Proposal 0570 - Obligation on Shippers to provide at least one valid meter reading per meter point into settlement once per annum

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal which Cadent would like to support.

Do you support or oppose implementation?

Support

Relevant Objective: d) Positive.

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

UNC currently mandates that a Valid Meter Reading shall be obtained for 'ALL' Annual Read Meters at least once every 24 months. This modification, in line with CMA requirements, would if implemented, ensure that a Valid Meter Reading is obtained every 12 months. We believe that any initiative, in this case an increase in the number of reads submitted to the CDSP, which leads to improved settlement accuracy and ultimately more reflective Shipper User invoices, has to be a positive measure. The modification also includes a 'reasonableness' test for Supply Points which have recently been taken into the ownership of a new Shipper User.

Self-Governance Statement:

Cadent concurs with the justification statement within the Draft Modification Report that this modification is not suitable for Self Governance as the changes are likely to have a material impact on commercial activities connected with the shipping, transportation or supply of gas conveyed through

pipes and for Shipper Users, where they rely on Suppliers for the provision of Meter Readings into gas settlement.

Implementation

This modification can be implemented immediately following approval by the Authority.

Impacts and Costs

No impacts or costs have been identified.

Legal Text

As provider of the Legal Text, Cadent Gas is satisfied that it meets the intent of the Modification Proposal.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

We have not identified any errors or omissions within this Modification Proposal.

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

No additional analysis or information is necessary in support of this Modification Proposal.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 07884 113385 (andy.clasper@cadentgas.com) should you require any further information.

Yours sincerely,

Andy Clasper
Stakeholder Specialist, Regulation & External Affairs