

Representation - Draft Modification Report UNC 0570

Obligation on Shippers to provide at least one valid meter reading per meter point into settlement once per annum

Responses invited by: **5pm 10 August 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Tim Hammond
Organisation:	Corona Energy
Date of Representation:	10 th August 2017
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

Corona Energy (CE) has been concerned about the levels of Unidentified Gas (UIG) that have been experienced by the market since Nexus go-live, both in terms of its materiality (around 5% of total throughput was deemed UIG for June 2017) and volatility.

A key aspect that affects UIG is the accuracy of Non-Daily Metered (NDM) settlement. The energy allocation for a NDM site, both its AQ and reconciled consumption, can be only be accurate if regular meter readings are submitted for that site.

CE therefore supports any development that will increase the number of readings submitted to the CDSP and so supports this modification. This change however represents a minor improvement above the current baseline, and efforts should be made by the industry to substantially increase the number of meter readings submitted above this annual minimum, in particular it should look to move to a six monthly read requirement as soon as possible.

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

Considering the impact that UIG is currently having on the market, this modification should be implemented as soon as possible.

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

Corona Energy currently seeks to obtain meter readings more frequently from its customer than the current proposed minimum and so there will be little operational impact from this change.

We expect there will be a minor reduction in the levels of UIG due to more frequent settlement reconciliations and more frequent rolling AQ calculations.

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

We have not reviewed the legal text.

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.*

There should have been some assessment of the merits of a more frequent meter read requirement than simply proposing an annual baseline.

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

None provided.